Empowering Regulators to Protect Consumer Rights in the ICT Sector

Consumer Research: Rwanda

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## List of Acronyms

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Full Form</th>
</tr>
</thead>
<tbody>
<tr>
<td>RURA</td>
<td>Rwanda Utilities Regulatory Agency</td>
</tr>
<tr>
<td>ICT</td>
<td>Information and Communication Technology</td>
</tr>
<tr>
<td>IDRC</td>
<td>International Development Research Centre</td>
</tr>
<tr>
<td>CDMA</td>
<td>Code division multiple access</td>
</tr>
<tr>
<td>GSM</td>
<td>Global System for Mobile Communications</td>
</tr>
<tr>
<td>ISP</td>
<td>Internet Service provider</td>
</tr>
<tr>
<td>RDB-IT</td>
<td>Rwanda Development Board</td>
</tr>
<tr>
<td>SEACOM</td>
<td>South Africa - East Africa - South Asia - Fibre Optic Cable</td>
</tr>
</tbody>
</table>
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Consumer Issues in the ICT Sector in Rwanda

1. Executive Summary

The aim of the research "Empowering Regulator to protect Consumer’s rights in ICT Sector " is to assist the Regulator in developing a comprehensive strategy for regulatory intervention in protecting consumers of ICT services in Rwanda.

The report tried to demonstrate the current issues faced by consumers of ICT in Rwanda as well as the perception of communication services by consumers, and provides possible solutions. The statement outlines the brief context of ICT sector development in Rwanda where it shows that Rwanda has made significant reforms by developing ICT sector in general. Currently, ICT market enjoys competition between three major operators that provides Internet, Mobile and Fixed phone.

In order to conduct data collection exercise, we have chosen a small cross section of consumers (24 persons) of ICT services. (Mobile, Fixed and Internet) The methodology used for the data collection is composed of two approaches. The first approach used was one to one interviews. The aim of this approach was to explore in details the issues raised by ICT Sector consumers and then identify those that affect them most.

The second approach was the Focus groups. The aim of the Focus groups was to explore with the interviewees what should be done in terms of possible solutions that address the issues raised during the one to one interviews. The sampling was based on the following criterion: Gender, Age, Location, Educational level and Income generation.

The findings of the survey showed the major issues that affect consumers of ICT services in Rwanda: The high cost of communication services came on top while quality of service was also mentioned as one of the critical issue. Others including charging and billing, network coverage as well as issues related to equipments and accessories. On the other side, the report indicates the role that can be played by different organizations to improve access and usage of ICT in Rwanda. Finally, the report concludes by giving a wide range of suggestions on how ICT services should be improved. In this context, it has suggested
that Government of Rwanda take charge of setting up the rules that can protect effectively the consumer’s rights of the ICT sector and encourage different service providers to improve the quality of their services. As claimed by most of interviewees that RURA is not known by many consumers, it has suggested that the regulator shall enhance its awareness campaign in order to educate and sensitize the Rwandan population in general and ICT consumers in particular. This campaign could also emphasize on the role of Consumers to protect their rights and educate the general Population on the importance of ICT in social and economic development of the country.

Consumer’s Associations have been indicated as important organs that can play a significant role in protecting consumers’ interests. For that reason, it has suggested that these associations shall be established and empowered in order to provide better intervention on behalf of the consumers.

Accordingly, the following recommendations are made:

- The government of Rwanda should strengthen the provisions in the law that empower the regulator, RURA, more effectively to protect consumer rights in communications;

- The regulator, RURA, should intervene more strongly to protect consumers by, inter alia, encouraging operators to improve their services, by requiring greater network coverage on the part of the operators, by intervening in respect of pricing and quality of service;

- RURA should regularly survey consumer perceptions regarding the various service providers, including the reasons behind such perceptions, and should publish the results of such surveys on its web site;

- RURA needs to engage more effectively in marketing itself to the public of Rwanda, via a variety of channels (including but not limited to SMS and its web site), advertising its role and responsibilities vis a vis those of government and the operators, and claiming greater public credit for its achievements and successes, particularly those in defence of consumer rights;
- The establishment of at least one association dedicated to the cause of consumers, to defending their rights, identifying and publicising their issues, and to advancing the cause of the consumers of communications services, should be supported.
2. Introduction

This report on Empowering Regulators to Protect Consumer Rights in the ICT Sector examines the qualitative research conducted between December 2009 and March 2010 on consumers of ICT services in Rwanda, especially consumers of mobile, fixed line and Internet services.

The purpose of this report is to analyse the results of a series of in-depth qualitative interviews conducted in the field within a small cross-section of consumers of ICT services. It reflects the views and perceptions of consumers on in relation to consumer protection issues, examining in detail their perceptions of the service providers, of the issues affecting them, of their understanding of their rights as consumers, and of the roles of the different organizations (including the regulator, the Rwanda Utilities Regulatory Agency (RURA)).

A number of countries on the continent of Africa have gone through different steps to build a strong consumer protection environment. During the monopoly era, it was almost impossible to initiate a consumer protection campaign as the telecomms sector was a government-owned monopoly with a very limited number of consumers. The issue of consumer protection started to emerge with the liberalization of the ICT sector, and the consequent introduction of mobile and Internet services. Countries such as Kenya and Uganda in the Eastern African region have been in the forefront of establishing strong regulatory agencies with a critical mass of consumer advocacy groups to support the emergence of consumer associations in the ICT sectors.

Rwanda is now in a better position to accelerate the development of consumer protection associations: on one hand, the tremendous increase of penetration particularly for mobile coupled with the liberalization of ICT services that have seen a great numbers of new players competing in mobile and Internet services, and on the other hand the current strengthening of the regulator, particularly the Consumer Affairs Unit, provide a hope that the tackling of consumer issues will be strengthened and the support to consumer’s protection associations will be reinforced in order to address consumer issues and encourage the emergence of credible and effective consumer groups within the country.
3. ICT context in Rwanda

At the time of writing, the current status of ICT in Rwanda can be characterised by three major features:

   a) The finalisation of a draft ICT Bill;
   b) Accelerated investment in national ICT infrastructure;
   c) Increased competition era in the Mobile and Internet sectors.

a) The finalisation of a draft ICT Bill

The aim of this draft Law is to establish a harmonized framework for policy and regulation across the broad information and communication technologies (ICT) sector, including:

   i. Electronic communications;
   ii. The Postal Sector;
   iii. Information Society;
   iv. Broadcasting Sector.

The Objectives of the new Legislative Framework for ICT include:

   (a) To establish Rwanda as a major global centre and hub for communications and Multimedia information and content services;
   (b) To promote a civil society where information-based services will provide the basis for continuing the enhancement of quality of both work and life;
   (c) To grow and nurture local information resources and cultural representation that facilitates the national identity and global diversity;
   (d) To regulate the sectors for the long-term benefits of the consumers and investors;
   (e) To promote a high level of consumer awareness and confidence in service delivery from the industry;
   (f) To ensure an equitable provision of affordable services over ubiquitous national infrastructure;
   (g) To create a conducive business environment for robust ICT applications;
   (h) To facilitate the efficient allocation of resources such as skilled labour, capital, knowledge and national assets;
(i) To promote the development of capabilities and skills within Rwanda’s convergence industries; and

(j) To ensure information security, network reliability and integrity.

The objective “promote a high level of consumer awareness and confidence” highlights the relevance of and need for research to inform and empower regulatory to ensure the promotion of consumer-based awareness as a critical milestone towards empowering the consumers to become active members of the Information Society.

b) Accelerated investment in national ICT infrastructure

The government of Rwanda and the major telecommunication companies are heavily investing in Broadband networks across the country. The government has initiated the laying of a national fibre backbone of 2 300 km that will reach each of the 30 districts of the country. The aim is also to allow all the telecomms players to share broadband infrastructure across the country. At the same time the three major telecom companies (namely MTN, Tigo and RwandaTel) are also expanding their Broadband networks, and 3G networks have became the standards used by these three big players. In addition, the arrival of the SEACOM cable has been eagerly awaited since December 2010, and will change dramatically the Internet business in Rwanda with a great impact on the major sectors such as Education, Health, Finance and Import-Export businesses.

c) Increased competition era in the Mobile and Internet sectors

Consumers in Rwanda are currently enjoying heightened levels of competition, especially in Mobile and Internet services. The growth rate of mobile penetration is almost 26% per year after the introduction of GSM service by RwandaTel in December 2008 and Tigo in November 2009. The country as a whole has reached 25% mobile penetration over the last year or so. This great improvement is worth underscoring as Rwanda has always lagged behind in ICT penetration and in respect of mobile in particular due to monopolist behaviour that has lasted for more than 10 years. Internet penetration is still very low due to a number of factors including the low availability of access to electricity in the country.

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and the persistence of high cost of Internet connectivity, but, since last year a number of Internet service providers have been launched, particularly in Kigali City, as well as in the larger towns. Competition has strengthened, particularly in respect of mobile Internet services provided by the three major competitors.

Table 1. Active Mobile Subscribers in Rwanda as of 16 January 2010

<table>
<thead>
<tr>
<th>Telecom Company</th>
<th>Active Subscribers</th>
</tr>
</thead>
<tbody>
<tr>
<td>MTN</td>
<td>1 886 023</td>
</tr>
<tr>
<td>RwandaTel</td>
<td>487 250</td>
</tr>
<tr>
<td>Tigo</td>
<td>123 897</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>2 497 170</strong></td>
</tr>
</tbody>
</table>


MTN, RwandaTel SA and the recently licensed Tigo are the major players in telecomms market. Those companies have bundled licenses for fixed and mobile telephony as well as Internet services. Currently, the trend shows a significant improvement in mobile penetration rate from 7% in 2007 to 13.8% in December 2008. This is essentially due to a tremendous growth in subscribers, now totalling 2 497 170 for the three companies (RwandaTel SA, MTN and Tigo). Although its subscriber base has fallen from 88% of the total in December 2008 to 76% in January 2010, MTN remains overwhelmingly dominant in the mobile telephony. MTN Rwandacell registered a significant subscriber growth rate from 608 832 in 2007 to 1 886 023 subscribers in January 2010, representing an increase of over 300% over the three years. This growth can be attributed mainly to the introduction of cheaper handsets on local market. RwandaTel SA, on the other hand, registered a subscriber growth rate of 71% on its CDMA network between 2007 and 2008, from 25 710 to 43 963 subscribers. RwandaTel SA further reported 120 000 GSM subscribers in December 2008. With regards to mobile public access points, the deployment of mobile public pay phones across the country has continued, but at low rate of increase. In September 2008, the number of mobile public pay phones had increased from 9 023 (in December 2007) to 9 467, representing a mere 5% increase. If all the network rollout commitments are not altered and are complied with, and the total cost of ownership reduces, then the following forecast of projected subscriber growth in the mobile sector by the regulator, from 2008 to 2012, looks set to apply.
If anything, the current figures reported by RURA (Table 1 above) suggest actual subscriber growth will exceed these projections. Mobile telephony is thus a sector characterised by rapid growth, bringing greatly increased numbers of consumers onto the market.

Figure 1: Mobile Subscriber Projections (2008 – 2012)

3.2. Fixed Telephony

RwandaTel SA remains the major provider of fixed telephony services. However, an analysis of subscriber figures in this sector now reveals decreasing numbers of subscribers - from 22 643 in 2007 to 16 770 in 2008, representing a significant decrease of 26%. The company reports a mere 1 195 public payphones on its fixed network. The consumers of fixed telephony services clearly therefore represent a small and declining percentage of telephony consumers, some 13% of the total.

3.3. Internet Subscribers

The following figure shows the trend in subscriptions in respect of both fixed and mobile Internet access as at the end of 2008 in Rwanda. Although the total number of Internet subscribers as that date was less than 10 000, it is a sector with high levels of growth, and was reported to represent a 67% increase over the 2007 figure.

Source: RURA annual report 2008

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Figure 2: Internet subscribers

Source: RURA annual report 2008
4. Consumer protection: the context in Rwanda

The Rwanda Utilities Regulatory Agency (RURA) is authorised and structured by Law No 39/2001 of 2001 as a public entity with autonomy in its daily activities. The main functions and responsibilities of the Regulatory Board as stipulated in the Law are to regulate the activities of identified public utilities, namely: ICT (telecommunications network and services), broadcasting, postal services, electricity, water; removal of waste products from residential or business premises; extraction and distribution of gas and transport of goods and persons. The above objectives are realised through the Regulatory Board’s power in the granting of licenses, issuance of regulatory guidelines, setting up of competitive frameworks for the regulated sectors, enforcement of consumer rights, the enforcement of network interconnection obligations and the management of the Universal Access Fund in accordance with Presidential Decree.

4.1. Consumer Affairs

The UN guidelines state that “all citizens, regardless of their incomes or social standing, have basic rights as consumers”. Nevertheless, the rights of consumers continue to be denied or violated by some service providers, and various powerful sections of society. In Rwanda, consumers are at the heart of the economy. Empowered consumers are important drivers of competitiveness and public utilities are basic to the competitiveness of an economy. However, in order for consumers to be able to play this role in imperfect markets where the balance of power lies in favour of businesses and suppliers, consumers must be protected. The main aim of the Consumer Affairs Unit within RURA is the co-ordination, and enforcement of measures for the benefit of the consumers in respect of the quality of services and products in the sectors regulated by RURA, along with the education of consumers in respect of their rights.


4.3. Enhancing the setting up of Consumers’ Associations

With the encouragement and help of RURA’s Consumer Affairs Unit three consumer associations have been registered. As the Ministry of Commerce has established a new unit responsible for consumer protection targeting all key utilities. The main issue is the capacity for such a unit to perform the campaign to sensitize associations as well as the capacity to educate consumers particularly in the ICT sector. Another issue that will need to be addressed is related to working relation between the consumer protection under RURA and the one under the Ministry of Commerce for smooth operation.

4.4. Achievements

RURA reports that from January 2009 to June 2010, 5745 complaints were registered against the existing operators\(^5\). RURA suggests that 99.6% were resolved which is a great performance particularly because of the limited human resources available in the unit responsible for consumer protection. The report stipulates the main reasons behind the complaints as the following:

- Billing
- Service interruption
- Poor customer services
- Equipment damage

RURA has also reviewed existing types of contracts between operators and consumers and had proposed amendments in a bid to address abuses against per consumers rights.

4.6. Association of Consumers

There are currently a number of consumer associations in the country but since there is no single database to locate them, it is very difficult at this stage to identify which ones have a

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particular focus in ICT. The Consumer Right Unit within RURA has already supported the establishment of three associations that will focus on ICT consumer rights⁶.

5. Consumer Issues in the ICT Sector in Rwanda

The following section of this report outlines the findings of a series of qualitative in-depth semi-structured individual interviews conducted with a sample of 24 stakeholders, followed by an in-depth focus group. The aim of this research methodology was to highlight levels of awareness and identify the issues affecting consumers in the ICT sector in Rwanda and suggest regulatory or policy interventions for the improvement of the experience of consumers. The data collection exercise was undertaken by using the methodology as outlined below.

5.1. Methodology

In order to collect the data in the qualitative in-country research phase of the project, two research approaches have been used. The first approach used is the face-to-face semi-structured in-depth interview using purposeful sampling with a degree of stratification. The purpose of using this methodology is to surface the issues affecting consumers of ICT services in Rwanda and to explore in some detail consumer perceptions of those issues.

The face-to-face interview covered and reflected the consumers’ views, including those in respect of the ICT services they use, the quality of those services, their perception of services rendered by different service providers, complaint handling processes and procedures, perceptions on the role of different stakeholders in the ICT sector, knowledge of consumers about their rights and channels they use to make complaints. Also the interviews reflect suggestions for the improvement of the experience of consumers.

The sample size was intentionally small, designed to allow relevant issues to emerge and be fully explored. The interview sample is intentionally not statistically representative, and cannot be extrapolated nationally, although care was taken to ensure inclusion and a balance between urban and rural, female and male, young and old, literate and illiterate, rich and poor.

The second approach used in this qualitative research was a focus group. The purpose of this approach was to validate the findings of the face-to-face interviews, examine key issues that surfaced during the interviews in greater detail, and to explore possible solutions to address the issues raised during the face-to-face interviews.
The sample of this research was twenty-four individuals. The selection of participants was based on the criteria as indicated below:

- Male: 12
- Female: 12
- Young (below 40): 12
- Older (Above 41): 12
- Rural: 12
- Urban: 12
- Literate: 16
- Illiterate: 8
- Low income: 12
- High income: 12

The criteria to choose the sample of participants based on the different variables above is reflected in the breakdown of the actual sample reflected in the table below:

```
<table>
<thead>
<tr>
<th>Literate</th>
<th>Illiterate</th>
</tr>
</thead>
<tbody>
<tr>
<td>M</td>
<td>M</td>
</tr>
<tr>
<td>4</td>
<td>4</td>
</tr>
</tbody>
</table>
```

Table 3: Variables of selection of the interviewees
The following table outlines a breakdown of participants in terms of category of employment, gender, age group, marital status and location:

<table>
<thead>
<tr>
<th>Employment Category</th>
<th>Gender</th>
<th>Age group</th>
<th>Marital status</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cashier in bank</td>
<td>male</td>
<td>25-34</td>
<td>Single</td>
<td>urban</td>
</tr>
<tr>
<td>Government Employee</td>
<td>Female</td>
<td>25-34</td>
<td>Single</td>
<td>urban</td>
</tr>
<tr>
<td>Business man</td>
<td>Male</td>
<td>35-44</td>
<td>Married</td>
<td>rural</td>
</tr>
<tr>
<td>Supervisor of programme, public institution</td>
<td>male</td>
<td>45-54</td>
<td>Married</td>
<td>Rural</td>
</tr>
<tr>
<td>Business Woman</td>
<td>Female</td>
<td>35-44</td>
<td>Married</td>
<td>Rural</td>
</tr>
<tr>
<td>Legal affairs in public institution</td>
<td>Female</td>
<td>25-34</td>
<td>Married</td>
<td>Urban</td>
</tr>
<tr>
<td>University student</td>
<td>Male</td>
<td>25-34</td>
<td>Single</td>
<td>Rural</td>
</tr>
<tr>
<td>Director of Project</td>
<td>Male</td>
<td>25-34</td>
<td>Single</td>
<td>Urban</td>
</tr>
<tr>
<td>Employee in a Security Company</td>
<td>Male</td>
<td>25-34</td>
<td>Single</td>
<td>Urban</td>
</tr>
<tr>
<td>Secretary in a Public Institution</td>
<td>Female</td>
<td>45-54</td>
<td>Married</td>
<td>Urban</td>
</tr>
<tr>
<td>IT Content Specialist</td>
<td>Female</td>
<td>35-44</td>
<td>Married</td>
<td>Urban</td>
</tr>
<tr>
<td>Business woman</td>
<td>Female</td>
<td>35-44</td>
<td>Married</td>
<td>Urban</td>
</tr>
<tr>
<td>President of Cooperative</td>
<td>Male</td>
<td>25-34</td>
<td>Single</td>
<td>Rural</td>
</tr>
<tr>
<td>Cooperative Member</td>
<td>Female</td>
<td>25-34</td>
<td>Single</td>
<td>Rural</td>
</tr>
<tr>
<td>Masonry</td>
<td>Male</td>
<td>35-44</td>
<td>Single</td>
<td>Rural</td>
</tr>
<tr>
<td>Cashier in the Bank</td>
<td>Female</td>
<td>25-34</td>
<td>Single</td>
<td>Rural</td>
</tr>
<tr>
<td>Business man</td>
<td>Male</td>
<td>25-34</td>
<td>Single</td>
<td>Rural</td>
</tr>
<tr>
<td>Secretary of Community Association</td>
<td>Female</td>
<td>45-54</td>
<td>Married</td>
<td>Urban</td>
</tr>
</tbody>
</table>
5.2. ICT services used by interviewees

The use of mobile services was universal within the interview sample, with Internet use widespread, but little use of fixed line telephony services. While this shows the sample not to be reflective of the usage patterns across Rwanda as a whole, from the point of view of determining the perceptions of the consumers of ICT goods and services, it reflects a useful population. The table below shows the distribution of ICT services used by the 24 interviewees:

<table>
<thead>
<tr>
<th>Services</th>
<th>Number of users out of 24(^7)</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mobile</td>
<td>24</td>
<td>100%</td>
</tr>
<tr>
<td>Internet</td>
<td>10</td>
<td>42%</td>
</tr>
<tr>
<td>Fixed</td>
<td>3</td>
<td>13%</td>
</tr>
</tbody>
</table>

\(^7\) Note that interviewees may be users of more than one ICT service.
As can be observed above, the use of mobile communication services was universal amongst the interview sample. This reflects the fact that interviewees were selected on the basis of their being consumers of mobile, Internet or fixed phone services.

Fixed phone users in Rwanda are decreasing due to the exponentially increasing penetration of mobile services. Comparing to past years, as we saw above, Internet users are increasing and this is partially coming from the increased presence of Internet service providers in the market. For example, all mobile operators have introduced mobile Internet through their mobile phones which allow subscribers with Internet-capable handsets to have access to Internet services in the major part of the country.

Another interesting observation is the number of subscribers for each of the mobile operators in Rwanda. MTN Rwanda is leading as the major operator with the biggest number of customers. RwandaTel SA has been identified as the second mobile operator while Tigo as the newcomer is still developing its customer base.

Also to note that most of the users can access Internet through cyber cafes.
5.3. Understanding of operators and their services by consumers
Rwanda is currently in a competitive era with three major operators that are in competition in the overall telecommunication market. In this context, consumers have to be empowered for them to make a better choice. This can guide them in terms of choosing the best operator that provides the best service at affordable price. For that reason, consumers have been asked to make the comparison of different service providers on the market in terms of the best services and affordability of price.

5.3.1. The Best Service Provider
The first question asked to the interviewees was to make a comparison between different service providers on the market based on their offerings, giving their view as to which service provider offers the best services in Rwanda. On this question, different views from consumers were provided as outlined in the table below:

<table>
<thead>
<tr>
<th>Service provider</th>
<th>No of Respondents</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>MTN</td>
<td>19</td>
<td>79%</td>
</tr>
<tr>
<td>RwandaTel</td>
<td>4</td>
<td>17%</td>
</tr>
<tr>
<td>Tigo</td>
<td>1</td>
<td>4%</td>
</tr>
</tbody>
</table>

Table 5: Best service provider

![Chart showing service provider preferences]

Figure 5: Best Service Provider

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8 No specific definition of “best” was suggested to respondents, who were thus asked to make their choice according to entirely subjective criteria - although reasons for their choices were also solicited and explored.
As shown above, the overwhelming majority of the respondents answered that MTN is the operator which provides the best service to its customers. This perhaps reflects the performance in the market of MTN Rwanda, which started its operations in 1998 and appeared to be the best service provider that has gained an extensive experience in communication services, along with the fact that the overwhelming majority of respondents were MTN customers.

“I think that MTN Rwanda is the best service provider because it’s the first company of mobile telephony in Rwanda, for that reason it has a great experience in telecommunication services market” (Business man)

The respondents emphasised network coverage and affordability of price as the key factors that make MTN the best service provider. MTN’s national coverage has reached 90% of the country, while affordability is more a matter of competition era that the country has entered in with the introduction of two new telecom providers.

*MTN provides the best services to the customers because its network coverage reaches the maximum part of the country and it seems to be constant even in the rural area (Programme Supervisor in Public institution)*

A much smaller but still significant number of interviewees felt that RwandaTel provided the best services in Rwanda, mostly citing the view that RwandaTel offers more advantages to its customers.

*RwandaTel provides the best services because it gives more promotion to its customers, for example using air time for 500 Rwf (USD 0.9) for a whole day (University student)*

Finally, only one respondent responded that Tigo Rwanda is the best service provider in Rwanda. His reason was based on the fact that although Tigo is still marketing its products, it offers low price of interconnection when compared to other existing mobile service providers in Rwanda.

As outlined above, most of our interviewees were of the view that the best service provider in mobile telecommunications was MTN Rwanda.
5.3.2. The cheapest service provider

In this section, exploring further the understanding of the operators by consumers, the question was to identify the service provider considered by consumers as the cheapest as well as explaining their reasons. This has been highlighted in the following table:

<table>
<thead>
<tr>
<th>Cheapest Service provider</th>
<th>No of Respondents</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>MTN</td>
<td>9</td>
<td>38%</td>
</tr>
<tr>
<td>Tigo</td>
<td>7</td>
<td>29%</td>
</tr>
<tr>
<td>RwandaTel</td>
<td>6</td>
<td>25%</td>
</tr>
<tr>
<td>No choice</td>
<td>2</td>
<td>8%</td>
</tr>
</tbody>
</table>

*Table 5: Cheapest service provider*

*Figure 6: Cheapest Service Provider*

As per the findings above a substantial number of the respondents believed that MTN was the cheapest service provider, with smaller groups favouring Tigo (29%) and RwandaTel (25%). The responses are fairly evenly divided here, suggesting there is no clear overall public perception of a price market leader in this market. Notwithstanding this, only 8% of the respondents said that they have no views regarding the cheapest service provider in Rwanda.

Taken together with the responses to the previous question, and coupled with the fact that the overwhelming majority of respondents are MTN customers, this result shows firstly that a number of consumers perceive a provider other than their own to be the cheapest, and hence, secondly, that consumers are making a price versus quality choice, and that their choice of service provider is driven by factors other than raw price.
Those respondents supporting the idea that MTN continues to come ahead as the cheapest service provider, argued that it has an extensive experience and has introduced more new services than any other operators in the country.

*MTN Rwanda always brings new services for which its customers have to make their choice and I think MTN zone is a tariff plan which enable consumers to save enough money while making calls.* *(University student).*

It is perhaps unsurprising that the new entrant with the smallest subscriber base, Tigo, is viewed as cheapest by nearly a third of respondents, since price differentiation is a typical market entry strategy.

5.3.3. The worst service provider

A further question aimed to identify which service provider was considered by consumers to provide the worst services to its customers⁹. The results with regard to this question are highlighted in the graph below:

![Figure 7: Worst Service Provider](image)

The graph and table above suggest that RwandaTel is viewed as the operator which provides the worst services by a substantial number (42%) of respondents. Common reasons cited by 60% the respondents for this view were problems with RwandaTel’s network coverage and its call prices seemed to be higher than those of its competitors. Some suggested RwandaTel does not have enough base stations in order to provide proper coverage around the country.

⁹ Again, respondents were allowed to use a subjective definition of what they considered to be “worst”, but again reasons for their choices were sought.
During the interaction, 30% of respondents suggested that most of RwandaTel’s base stations are installed in the major towns with very limited coverage in rural areas.

*Network coverage of RwandaTel is not reaching every part of the country, and it charges more when we make calls to other operators. (Cashier in a Bank)*

“I am getting trouble in switching to RwandaTel since its network doesn’t reach our district. This brought me to choose MTN which covers the whole country and allows us to be in communication with our friends from anywhere“ (lecturer).

5.3.4. The most expensive operator

The final point related to the understanding of the service of operators by consumers was to know from the interviewees the operator they think is the most expensive in Rwanda. On this question, various opinions were given as shown below:

![Figure 8: Most expensive Service Provider](image)

The findings of the interviews show us that MTN has been mentioned by a substantial number (46%) of respondents as the operator which is the most expensive. A further sizeable number (42%) believe that RwandaTel is the most expensive, while only 4% mentioned Tigo. Finally, 8% said that they didn’t have any opinion on this question.

The responses to this question may appear to some extent to contradict previous responses about the cheapest service provider, where a nearly similarly substantial number (38%) of respondents viewed MTN as the cheapest operator. The results, however, may simply reflect MTN’s position as market leader, and thus a provider about which firm and definite views are held. Different reasons are raised by consumers pointing to MTN as the most
expensive telecommunication company in Rwanda, many referring to the previous experience during the monopoly era when MTN was the only player on the ground.

They emphasized that MTN products are still expensive and other services like SMS are too high compared to Tigo and RwandaTel.

Some of the interviewees suggested that MTN should capitalise on its position as the first mobile service provider by decreasing the prices of its products and services offered.

5.4. Switching from one service provider to another

Besides exploring consumers’ understanding of the operators by making comparison of the different service offerings on the market, another interesting question, especially with Rwanda’s telecommunications market now entering an era of competition, was to understand the ability of consumers to exercise choice and empowerment in the telecomms market, by asking if interviewees had switched from one service provider to another.

Very few interviewees (10%) stated that they have switched to another service provider, with reasons cited including hoping to benefit from various promotional advantages, and network congestions.

   I have switched from MTN to RwandaTel because it came with different promotional services to its customers, I could make free calls from RwandaTel to RwandaTel during one month (Business woman)

   I switched from MTN to RwandaTel because many times I received a signal that network is busy, so that it was not easy to be connected with my friends (University student)

Another observation from some interviewees is that people like to use two or three SIM cards from different operators so that they can get benefits of each service providers during the time when there are promotional campaigns. An estimate of 25% of overall subscribers is holding two SIM cards as per the Rwanda Sector Performance Report 2009-2010. The lack on number portability was cited by some as a barrier to switching providers, because many people know you through your previous service provider’s number. In addition some consumers are not interested to the new operator since they haven’t got any problem and
found that it is less attractive. Some of the interviewees seemed to adopt a conservative attitude and were simply reluctant to change from their first service provider.

5.5. Major Consumer Issues in Communication Service in Rwanda

The focal point of this section is to identify various issues which affect the consumers of ICT services in Rwanda. From this regard, the issues raised by consumers have been grouped into different categories.

As we will show below, issues in terms of pricing, quality of service, charging and billing, network coverage, and equipment are on the top of major issues raised by consumers in the telecommunications sector.

The table below shows the frequency of each issue as raised by the consumers interviewed. Each issue will be discussed in greater detail below.

<table>
<thead>
<tr>
<th>Issues raised</th>
<th>No of respondents (out of 24)</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pricing</td>
<td>21</td>
<td>88%</td>
</tr>
<tr>
<td>Quality of service</td>
<td>19</td>
<td>79%</td>
</tr>
<tr>
<td>Charging and billing</td>
<td>9</td>
<td>38%</td>
</tr>
<tr>
<td>Network coverage</td>
<td>17</td>
<td>71%</td>
</tr>
<tr>
<td>Handsets</td>
<td>16</td>
<td>67%</td>
</tr>
</tbody>
</table>

Table 6: Frequency of Issues
5.5.1. Issues in terms of prices

Amongst the issues affecting the consumers of telecommunication services in Rwanda is the problem of pricing, with the issue of high prices for telecommunication services being raised by the majority of the interviewees as the most important consumer issues and one that constitutes the barrier for many consumers to have access to the telecommunication services. The overwhelming majority (88%) of the interviewees said that prices for telecommunications services, especially mobile services, were still a big problem and they are being charged too much.

“The prices are too expensive, I have difficult to talk everything by using my mobile phone because MTN charges me too much”. (Technician in the private company)

Some 70% of interviewees showed that many consumers see affordability as a key issue, making a comparison between their income and the prices of telecommunication services.

“Here in Rwanda the cost of service is still too high. It is difficult to use phone every day compared to my income generation.”(Secretary, Association)
65% of interviewees said that mobile service was very expensive compared to other services like Internet and fixed line, pointing to the high prices charged by some service providers to send an SMS, and to high interconnection rates\textsuperscript{10}.

“I spend 30 francs only to send one SMS from MTN to MTN. I am very frustrated by MTN because the charges are too high to send the SMS to other operator”.

(Student)

In addition to the cost for calling and sending SMS locally, 40% of the interviewees felt that international calls are too expensive. They suggested that costs of telecommunication services should be reduced in order to be accessible for many people living in the country.

5.5.2. Issues in terms of quality of services

The issue of quality of service was identified as a second priority issue affecting consumers in the telecommunication sector in Rwanda. As shown above, a substantial majority of interviewees (79%) said that the quality of service delivered by operators in Rwanda is still poor. Just over half (52%) of those mentioning quality of service agreed that they experienced a significant number of dropped calls while calling from one operator to another.

“I experienced many dropped calls when I make a call to Tigo and RwandaTel; during conversation I face some cuts which affect me in the conversation”.

(Manager, Construction Company)

Another issue raised in relation to quality of service was the inadequate quality of voice. Consumers said that they are faced with a problem of inadequate quality of voice especially when calling across networks to another service provider. Further, a third (32%) of those interviewees mentioning quality of service said this was manifested through network congestion at the certain times of the day, especially during the weekends and public holidays.

“Sometimes during the weekend, the network becomes congested; I try to call my colleagues but I receive a signal that network is busy”. (Masonry)

Some 35% of interviewees cited quality of service issues in respect of the Internet, pointing to the problem of slow Internet connection and saying that they experience frequent

\textsuperscript{10} Interconnection prices were recently published in the daily press known as The New Times in January 2009, which accounts for consumer awareness of what are essentially wholesale prices.
disconnection and cuts which have the negative impact to their businesses in terms income generation.

“Frequently we have a slow Internet connection and disconnection. For that reason the users of the cyber café leave without paying which causes to me a big loss”. (Manager, cyber café)

Regarding Internet quality of service, one interviewee raised the issue of low modem capacity. He said that they have a problem when doing their activities like downloading or sending the big documents.

“I suggested to the operators to improve the capacity of their modems, I face with the problem of low capacity of modem when I want to download the big documents. It is not possible for me by using the Modem of 2 G”. (Director, Project)

5.5.3. Issues in terms of network coverage
A further substantial proportion of interviewees (71%) feel that Rwanda’s telecommunication sector is faced with a problem of network coverage, but this is more a perception as opposed to reality, especially in remote and rural areas such as the northern and eastern provinces of the country. Interviewees said that the lack of access to the network is a critical issue which disturbs their activities which require the use the mobile phone.

Interviewees citing lack of network coverage as a key consumer issue pointed to some service providers whose network coverage does not reach the maximum part of the country, singling out especially the newcomers, namely TIGO and RwandaTel, and pointing to coverage in areas of difficult terrain, particularly in the numerous valleys in Rwanda’s rural areas. They felt that the resultant lack network availability was highly problematic.

“It is difficult for me to make a call if I am located in the remote area especially in the valley. I have to climb the mountain in order to get network”.

Even if Rwanda seems to have enough network coverage in the urban areas, some interviewees said that they experienced a lack of network coverage in some urban areas where network would have been expected.
“My friends send me an SMS saying that they can’t reach me because I switch off my mobile phone, in reality it is a problem of lack of network coverage instead of switching off a phone”. (Young woman)

5.5.4. Issues in terms of equipment
The quality of telecommunication services depend on the quality of end-user equipment, handsets in particular. Another substantial majority (67%) cited problems with equipment as a key consumer issue. Equipment issues raised by interviewees include the short life of cell phone batteries, which means that they need to be recharged very often. Also, they mentioned the problem of handsets which do not comply with the standards required for being used and can cause damage to their health. Finally 40% cited the poor quality of voice from handsets currently on the market.

5.5.5. Issues in terms of charging and billing
The issue of charging and billing was further raised by a fairly substantial number of consumers (38%) as a problem which they encounter. They claim to be charged for things for which they are ought not to be charged, and suggest that the way in which charges are made and presented seems to be insufficiently clear.

“Sometimes or certain time of the day MTN charges me too much and other moment charges are less especially when I use MTN per second. The way in which charges are made is very complicated to me”. (Employee, company)

Beside these issues, some interviewees mentioned the absence of electric power in rural areas, meaning that they have to walk long distance for recharging the batteries of their mobile handsets, especially in those remote areas where there is no electric infrastructure.

5.6. Consumer Contact and Complaints Made

5.6.1 Complaint Handling Process
This section of the interview was designed to identify whether consumers were aware of when their rights as consumers had been infringed, and whether they were aware of the channels of redress available to them, and if they have used these channels. Some 30% of interviewees stated that they had made complaints to their service providers. The majority (60%) of the
participants said that they had never made any complaint because they were not sure that their complaints would be handled and that it would be a long process in order to receive redress. Those few complaints which have been made to the service providers include those related to the charging and billing process, particularly being overcharged due to lack of clarity on call pricing, as well as complaints about Internet disconnection, and complaints about long procedures for doing a SIM swap after losing a SIM card.

“One day I loaded into my phone the airtime of 500 Rwf but automatically all the amount was charge. I called MTN [to say] what happened and [to tell them] to reimburse it, but till now no reimbursement is made”. (University student)

“I made a complaint asking why the Internet connection has frequent cuts, but the service provider doesn’t pay us what we lost “. (Manager, cyber café)

One interviewee claimed that her service provider had cut her Internet service on the grounds that she hadn’t paid her bill, despite her having already paid before even receiving an invoice. Even if their problems remained unresolved, no participant said that they had escalated their complaint, describing this as a waste of their time without any result.

In contrast, however, a majority (60%) of interviewees said that they often use the customer help line of their service provider for various reasons including requesting for assistance to register into a new system, loading airtime on the phone, requesting information about charging, requesting technical assistance when there is problem related to calling or sending SMSs.

5.6.2. Knowledge of Consumers’ Rights
The research also aimed to test consumer awareness of their basic rights. The findings of this survey show us that consumers know very limited rights in the telecommunication services. Amongst the rights identified by consumers were the following:

- 25%: Access to the information about services delivered by operators to the customers and where to make complaints;
- 70%: Get technical support for handsets and other devices used;
- 30%: To be heard by service provider when asking information;
50%: To know any time what call costs are;

- To receive good service as paying customers;

Get enough information on the new systems brought onto the market.

Some interviewees indicated that they pay for the services used, for that reason service providers have the obligation to offer to them good service all the time.

“Service providers have to improve the quality of services delivered to the customers considering what we are paying for”. (Content specialist, Educational project)

5.7. Knowledge about the Role of the Regulator

The interview were concluded by covering two related topics, identifying what consumers knew about what is being done in respect of consumer protection, and what sorts of interventions they would like to see. Interviewees were asked if they knew the regulator responsible and to give its name. Only a very few (20%) of the interviewees were aware of Rwanda’s telecommunication Regulator.

“I do not know Rwanda’s telecom regulator and its name”. (Director, Project)

Some respondents appeared confused, mentioned the names of service providers or other public institutions.

“I think Rwanda’s telecom Regulator is MTN”. (Woman, Rural area)

“The telecom Regulator in Rwanda is Rwanda Development Board (RDB)”. (University student)

Those who were aware of the regulator said that, although RURA (Rwanda Utilities Regulatory Agency) was trying to do its tasks, it still had much to accomplish in terms of protecting the consumers of telecommunications services.

“The regulator (RURA) should care about the concern of consumers from the services they receive”. (Employee, Public institution)
5.8. Role of Different Institutions in Improving the Consumer Experience

Interviewees mentioned that different organizations can play important role in order to help consumers in telecommunication services in improvement the services they receive.

5.8.1. What should the Government do?

The Government of Rwanda was been mentioned by the vast majority (90%) of consumers interviewed as the high-level engine to empower all other institutions involved in telecommunication sector. 40% of the participants identified what should be done by the Government, but often confusing the respective roles of government and the regulator, saying that Government should put in place the rules and regulations governing the various service providers and should take the necessary measures against those operators that do not comply with regulations.

“Government should set up telecom consumer legislation and show the standards of complaints handling”. (Legal Affairs, Public institution)

It was suggested by the majority of interviewees that Government should support consumer associations and ensure that the regulator is fulfilling its responsibilities, and further that Government should educate consumers about their rights.

“Government should help their people by educating them about their rights”. (Business man)

Some participants said that government has to play a big role in price regulation and ensure that rules are followed by service providers and if their products are not expensive.

“Government should make the follow up of all operators and ensure that their services are offered on the affordable prices”. (Masonry)
A third of the interviewees suggested that Government has an obligation of regulating the sector and ensuring that customers receive their services at affordable prices, even mainly to ensure that all Rwandese receive the same services (network coverage) wherever they are even in the rural areas. Some even suggested that Government should be involved in the complaints handling and resolution process.

5.8.2. What should the Operators do?
Operators have been noted by all the interviewees as the entities that need to play an important role in improvement of the experience of consumers. A majority of the interviewees noted that the operators should improve the quality of their services and should provide better service to the consumers.

“Operators should provide good quality of services to the consumers by offering the promotional services and respect them”. (University student)

“Operators should make the improvement of the quality of services provided to their customers”. (Person in the Rural area)

One interviewee felt that all operators should put work closely with customers, suggesting that they put in place mechanisms for collaboration with consumers and follow up on the service rendered by their employees.

“Operators should work closely with the customers and make follow up on the services rendered by its employees to the customers”. (Business man)

Apart from such collaboration with customers, some interviewees suggested that all operators should collaborate and share information between themselves on how to offer good service to customers.

“All service providers should have a good collaboration within themselves”. (Legal affair Officer, public institution)

“All services should have a good interconnection and collaboration”. (Worker in Private Company)
“Two frustrated participants” said that the operators should improve their customer service in terms of dealing with the customers. In this context, they should improve the knowledge of their staff on how to give good service. Also, the Operators should improve their internal administration in order to offer quick services to the customers.

“The Operators must provide good services to the customers, to have good internal administration which facilitates the customers for payment and to share the information within employees”. (Content specialist, Project)

“The service providers’ heads should sensitize their customer care services on how to deal with the customers”. (Employee, Security Company)

Some interviewees suggested that operators should provide more information related to their services, particularly on the new technologies used as well as the cost of services.

“The Operators must publish information about their services and about new technologies and cost associated”. (Business man)

In order to deliver good services to the consumers, the interviewees said that Operators should respect the clauses of the contract signed before starting working; and the Regulator have to ensure if they are applicable.

5.8.3. What should the Regulator Do?
Many interviewees mentioned that prices of telecommunication services on the market seem to ignore the social and economic conditions of the consumers in Rwanda. For that reason, a majority (67%) of interviewees suggested that Regulator should intervene in price regulation.

“The Regulator should make price regulation according to the income generation of Rwandans, [and] defend the interest of customers”. (Content specialist, Project)
“Regulator should help us to reduce the prices in order to be access to the telecommunication services by many people”. (Business man)

*The Regulator should put in place the standards of prices country wide for mobile and Internet use (Business man)*

A few interviewees suggested that the Regulator should continually monitor the services offered by operators to customers to ensure that they meet the requirements of licences and regulations. Others suggested that the Regulator should also be involved in consumer complaints procedures in order to ensure that both sides are balanced in terms of satisfaction.

One participant said that Regulator should put in place free telephone lines for consumers to lodge complaints or report other problems regarding the service received from the operators.

> “The regulator should put in place free telephone lines for customers so that they can make calls whenever they get a complaint with their service providers”. (Employee, Security Company).

Some respondents felt that Regulator should work hand in hand with the Government. Others felt that Government should empower the regulator in order to be improve the environment in the telecommunications sector in the country.

Some respondents suggested that the regulator extend its activities countrywide, opening branch offices in different parts of the country, including in rural area, in order to work closely with and know the views of consumers about the services they receive, even in remote areas.

As pointed out earlier, Rwanda’s telecomms regulator is not known by many of the respondents. Consumers therefore felt that the Regulator should sensitise people about its activities in its various domains, especially in the telecommunication sector.
“The Regulator should work as possible in other to inform all consumers what is able to help them in case of serious problems”. (Business Woman)

5.8.4. What should the consumer groups do?
The concept of consumer groups or associations in the telecommunication sector sounded strange to many of the interviewees, with none being aware of any consumer association in the country.

A few of the interviewees did however suggest that consumer groups would be useful in defending and representing the interests of consumers, and in speaking on their behalf in decision making in the telecommunication sector. Some participants suggested that consumer groups should ensure that complaints made by consumers are properly resolved, and should collaborate with service providers to this end.

“Consumer Groups should defend and represent the interests of consumers”. (Teacher, Primary school)

“To ensure and follow how the complaints made by the consumers are handled and defend the interest of consumers”. (University student)

One interviewee suggested that consumer groups should mobilise consumers to boycott the operator which provides worst services to its customers, and get involved in the pricing process.

“Consumers Groups should boycott an operator which provides worst services to the customers, [and] negotiate about prices of services”. (Content specialist, Project)
6. Focus Group Results

The purpose of focus group was to explore in greater depth and detail the major issues that have emerged from the interviews and to identify possible solutions that consumers are able to propose to the particular issues they have raised. Other issues tackled in the focus group included understanding and highlighting the impact of illiteracy, gender, geographic location and impact of income on consumer attitudes and on consumer protection.

The discussions in the focus group focused particularly on the major consumers issues raised, such as the complaints concerning charging and billing, network coverage and quality of service. Literacy was viewed by the focus group as having a direct impact on consumer perception about the quality of services offered by the various service providers. The discussion during the focus groups suggested that literate consumers are far more empowered to complain about the quality of service, especially in respect of mobile and Internet services, such as problems of network congestion, low speed of the Internet and dropped calls. Those who are less educated identified complaints concerning charging and the cost of calls on mobile. The discussion showed that consumers who are less educated are not aware about consumer rights, with some agreeing that they hesitate to make complaints about poor service. This suggests that level of literacy affects both perception of consumer issues and the ability to complain about service problems.

Regarding Gender difference, the discussion during the focus groups suggested that men are more likely to make the complaints than women. Women appear less likely to complain, saying that they do not have enough time and that the complaint process takes too long for them. Women participants further reported facing more problems regarding the theft of their handsets. The participants suggested greater collaboration between the police and consumer groups to track down and recover stolen handsets.

The focus group identified issues affecting consumers in rural areas as poor network coverage and equipment problems in particular, but also the lack of electric power in order to recharge batteries. Further, rural consumers have complaints about lack of availability of airtime and few if any nearby customer centres to lodge complaints, as well as the price of telecommunication services, especially mobile calls. The focus group suggested that service providers, in collaboration with government, should help rural consumers to resolve the problem of power and extend customers service centres in the rural area.
The focus group suggested that the issues for urban consumers were more likely to be in relation to slow Internet connectivity, network congestion, the poor quality of customer care and the frequent theft of mobile handsets. The focus group suggested that service providers should train their employees better in dealing with consumers.

The focus group identified issues for corporate consumers as quality of service; customer care and network quality. For improvement of this situation, the participants in the focus group suggested that the service providers should increase the capacity of network.
7. Conclusion and Recommendations

This report outlines the major findings of the survey conducted to the interviewees regarding the issues which affect them. While definitive national results cannot be extrapolated from the findings in respect of a relatively small sample such as this, a number of useful conclusions can be drawn.

Firstly, it is clear that consumers have definite and clear views on the various service providers in the market, in respect of the price and the quality of the respective service offerings, and are able to give reasons for their views. It would therefore seem important to monitor consumer perceptions of the various service providers and their reasons for such perceptions on systematic and ongoing basis, and to report the results of such surveys to the public of Rwanda.

Secondly, a number of issues affecting the consumers of communications services appear to be prevalent, including: pricing, quality of service, charging and billing, network coverage as well as issues related to equipment. Whilst the relative national prevalence and weighting of these various issues cannot be gauged from a small sample such as this, their relative weighting within the sample suggests that they are real and prominent issues, necessitating further investigation, followed by specific intervention in defence of consumer interest by the regulator.

Thirdly, the research shows a considerable lack of awareness on the part of consumers as regards the regulator and its role, along with some confusion regarding the respective roles and responsibilities of the various bodies involved in consumer protection in Rwanda. This is to some degree natural and to be expected in a complex modern society, but it does suggest the need for improved communication with consumers and the public in general, along with a need for educational and awareness-raising interventions.

Accordingly, the following recommendations are made:

- The government of Rwanda should strengthen the provisions in the law that empower the regulator, RURA, more effectively to protect consumer rights in communications;
- The regulator, RURA, should intervene more strongly to protect consumers by, inter alia, encouraging operators to improve their services, by requiring greater network coverage on the part of the operators, by intervening in respect of pricing and quality of service;

- RURA should regularly survey consumer perceptions regarding the various service providers, including the reasons behind such perceptions, and should publish the results of such surveys on its web site;

- RURA needs to engage more effectively in marketing itself to the public of Rwanda, via a variety of channels (including but not limited to SMS and its web site), advertising its role and responsibilities vis a vis those of government and the operators, and claiming greater public credit for its achievements and successes, particularly those in defence of consumer rights;

- The establishment of at least one association dedicated to the cause of consumers, to defending their rights, identifying and publicising their issues, and to advancing the cause of the consumers of communications services, should be supported.