



MALTA COMMUNICATIONS AUTHORITY

Strategy Update 2025 – 2027

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1 Purpose

This document provides a rolling update of the Malta Communications Authority's (MCA) strategic direction for the period 2025 - 2027. It contains the MCA's strategic thrusts and includes new developments that are envisaged as having a significant impact during the plan period.

The sectors that are addressed in this document are the ones falling under the MCA's regulatory remit, specifically addressing its responsibilities within the communications sector, encompassing both the digital and postal sectors.

The key thrusts identified in this Strategy Update constitute the conceptual framework for the activities that are articulated in the Business Plan for the same time-period.

The content of this Strategy Update is aligned with the MCA's visibility of its official mandate as at date of presentation.

2 Contextual Background and Sectoral Outlook

Background

Introduction

The contextual background of this year's Strategy Update continues to revolve around three main themes: international developments, policy direction at both European Union (EU) and national level, and sectoral activities on the ground. Together, these factors present opportunities and challenges that inform the MCA's strategic priorities in a rapidly evolving regulatory and operational landscape.

Geopolitical events continue to exert widespread effects on economies worldwide. Concurrently, climate change remains a critical issue, with the transition to a low-carbon economy recognised as a global priority. Alongside these significant global challenges, additional factors impact the Maltese economy and play a crucial role in informing the development of this Strategy Update.

Two critical European regulatory frameworks - the European Electronic Communications Code (EECC) and the Digital Services Act (DSA) - remain pivotal developments for the MCA, demanding careful interpretation and implementation. The EECC is considered a central piece of legislation to achieve Europe's Gigabit society and ensure full participation of all citizens in the digital economy and society. Meanwhile, the overarching objective of the DSA is to foster a safer and more secure online environment for both consumers and businesses.

The digital connectivity landscape is changing rapidly with convergence of telecom, cloud and edge technology, driven by virtualization and Artificial Intelligence (AI). To address these changes the European Commission (EC) is preparing the Digital Networks Act (DNA), which will include a review of the EECC, designed to incentivise integrated connectivity and computing infrastructures, creating equitable conditions for all service providers. By addressing technological convergence, a new telecoms regulatory framework aims to position Europe at the forefront of digital innovation, infrastructure resilience and connectivity.

The postal sector is also undergoing significant transformation. Declining letter mail volumes and the ongoing surge in e-commerce parcel services are reshaping the postal market, while digitalisation is driving new business models and heightened consumer expectations. These developments challenge the sustainability of the universal service obligation (USO) and call for a reformed European Postal Services Directive (PSD) to address key issues, such as sustainability of the universal service, consumer protection, a level playing field for operators and climate change objectives.

Regarding sectoral activities on the ground, it is fair to say that, at the current level of visibility, new or renewed thrusts during the strategy period will be mainly forthcoming as a result of

such developments. These include changes in the competitive dynamics within the electronic communications sector, the continued proliferation of very high-capacity fixed and wireless networks (VHCNs) and the critical importance of safe, secure and resilient digital infrastructures. Additional priorities involve ensuring adequate spectrum resources are available to support innovation, empowering consumers to make informed choices that are right for them and are protected, combating electronic communications-based scams, fostering safer online environments, and ensuring the long-term financial sustainability of the universal postal service. These main developments will characterise the forthcoming plan period.

In 2025, the MCA is expected to take on additional responsibilities within the digital ecosystem. These include the supervision of European digital identity wallets established in Malta, overseeing the seamless switching of data processing services, and ensuring compliance with cybersecurity risk management measures for providers of public electronic communications networks, providers of publicly available electronic communications services, trust service providers, and postal operators. These new responsibilities will bring MCA into new sectors with new stakeholders, both in Malta and across Europe.

This evolution presents a strategic opportunity for the MCA to strengthen its regulatory role in the rapidly evolving digital landscape. It aligns with the MCA's mission to foster a communications environment that promotes investment, innovation, economic growth and social well-being, ensuring Malta remains at the forefront of digital transformation.

External & Policy Developments

The Global Environment

Geopolitical events continue to intensify global uncertainty, with conflicts in the Middle East and Russia's ongoing war in Ukraine posing direct threats to affected regions and causing ripple effects that destabilise international relations. As these conflicts persist, the digital sector - digital infrastructures, cybersecurity, AI, internet governance, data protection - faces increasing scrutiny and heightened vulnerabilities. This evolving landscape underscores the critical need for resilience and adaptability to navigate challenges posed by rising global risks.

As the world navigates this complex environment, actively monitoring and addressing these challenges is essential to maintaining stability and security within the digital ecosystem. The rapid integration of technology across businesses and households further highlights the critical importance of resilience and security at all levels of the value chain. This awareness has galvanised a shared commitment to protecting digital infrastructures from both human-made and natural hazards. It has highlighted the complementary roles of terrestrial, satellite, and submarine connectivity solutions in ensuring uninterrupted service availability and strengthening the resilience of global communications.

The growth of the electronic communications sector in the post-COVID era is fuelled by increasing demand for digital services, technological advancements like 5G, and the continued expansion of e-commerce. Significant investments in digital infrastructures, coupled with an increased emphasis on cybersecurity, are further strengthening the resilience of Malta's digital sector. Moreover, the sector's adaptability to emerging challenges and its dedication to environmental sustainability have positioned it for sustained growth and innovation in the years ahead.

E-commerce has become an indispensable part of modern life, seamlessly connecting consumers and businesses in a global marketplace. The ongoing growth in e-commerce activity, coupled with widespread adoption of online payments, underscores a structural shift in consumer behaviour towards the convenience and efficiency of digital transactions. Challenges with cross-border e-commerce mentioned in last year's strategy update - such as changes in the Universal Postal Union (UPU) international postal remuneration system (commonly known as terminal dues) and new EU regulations on electronic advance data and taxation policies for international mail - no longer pose major constraints. In fact, cross-border e-commerce mail volumes have not only stabilised but are on the rise. Furthermore, local e-commerce activity continues to thrive, as more businesses adopt online sales channels.

In Malta, economic growth continues to exceed expectations, driven by stable energy prices and the recovery of the hospitality sector following the COVID-19 pandemic. However, labour and skills shortages remain the primary limiting factors for the Maltese economy. The shift towards 5G, cloud computing and AI has intensified the demand for specialised skills, yet the sector faces a talent shortage, particularly in fields like cybersecurity, network engineering and data analytics.

Last but certainly not least, lies the grave risk posed by climate change with increasingly alarming signs, year on year. Electronic communications networks and services stand as a key enabler in the reduction of carbon emissions, as we aim for a more environmentally sustainable society.

Policy Developments

Malta's competitiveness depends on the digitalisation of all sectors and on building strengths in advanced technologies, which drive investment, job and wealth creation. However, seizing the benefits of digitalisation and advanced technologies requires state-of-the-art digital infrastructure coupled with strengthening employees' and citizens' digital skills.

The EU's Digital Decade Policy Programme (DDPP) 2030 provides Member States with a strategic framework to key digital transformation objectives. It focuses on improving citizens' basic and advanced digital skills, promoting the adoption of innovative technologies such as AI, data analytics and cloud computing, and advancing connectivity, computing, and data infrastructure across the EU. The objectives and targets of the DDPP 2030 play a pivotal role

in enhancing Europe's competitiveness, resilience and sovereignty, while remaining aligned with European values and supporting climate action goals.

Gigabit connectivity is a cornerstone of digital transformation, and Malta has made significant progress in this area. With full coverage of Very High-Capacity Networks (VHCN) and 5G infrastructure already in place, driven by substantial private sector investments, Malta is well-positioned amongst the leaders in digital infrastructure, providing a strong platform for continued innovation and growth.

As a member of the Body of European Regulators for Electronic Communications (BEREC), the MCA plays a vital role in shaping regulatory best practices, including opinions, recommendations and guidelines related to the implementation of the EECC and other digital infrastructure regulations. Participation by the MCA in BEREC goes beyond useful practice and is a legal requirement under the BEREC Regulation. This takes the form of active engagement in the various structures (such as Expert Working Groups, Contact Network, Board of Regulators, etc.) tasked with the execution of the BEREC Work Programme. This involvement positions the MCA to provide well-informed policy advice to the Government, particularly on the broader digital ecosystem.

In May 2024 the European Gigabit Infrastructure Act¹ (GIA) entered into force and will be fully applicable from November 2025. The GIA replaces the 2014 European Broadband Cost Reduction Directive (BCRD). The MCA has a keen interest in the implementation of the GIA. It serves to accelerate, simplify and lower the costs associated with the deployment of fixed and wireless VHCNs. Additionally, it serves as an additional tool for promoting infrastructure-based competition in gigabit broadband. The MCA will contribute to implementing the GIA into national law.

Digital infrastructures are the backbone that enable the secure and efficient operation of electronic trust services. The new European Digital Identity (EUDI) Regulation² establishes a comprehensive framework for a European Digital Identity, building on the 2014 Regulation on electronic identification and trust services for electronic transactions (eIDAS Regulation). A key component of the EUDI Regulation is the requirement for Member States to offer at least one European Digital Identity Wallet to their citizens and residents by November 2026. The wallet will be in the form of a mobile app enabling users to identify themselves to public and private online services, all over Europe. In addition, users will be able to store, present and share digital documents as well as electronically sign or seal documents. The MCA, already responsible for overseeing digital trust services, has been entrusted with supervisory responsibilities for digital identity wallets established in Malta, further strengthening its role in

¹ Regulation (EU) 2024/1309 on measures to reduce the cost of deploying gigabit electronic communications networks.

² Regulation (EU) 2024/1183 establishing the European Digital Identity Framework.

fostering secure and reliable digital ecosystems. The MCA will also contribute to implementing the EUDI Regulation into national law.

In 2025, the MCA is expected to be designated as the competent authority responsible for cybersecurity and for the supervisory tasks of the NIS 2 Directive³ in relation to the following essential and important entities: providers of public electronic communications networks, providers of publicly available electronic communications services, trust service providers and postal and courier services. In addition, the MCA is expected to be designated as the competent authority responsible for the resilience of relevant critical entities (i.e., providers of public electronic communications networks, providers of publicly available electronic communications services and trust service providers) under the Critical Entities Resilience (CER) Directive.⁴ The combined application of these two directives will enable the MCA to tackle cyber and physical threats in a more integrated and holistic manner. The exact nature of MCA's role has not, as of December 2024, been finalised. The MCA expects, however, that greater clarity will be forthcoming early in 2025.

The European Data Act⁵ entered into force on 11 January 2024 and will become applicable in September 2025. The Data Act lays down harmonised rules on fair access to and use of data by imposing business-to-consumer and business-to-business data sharing obligations on manufacturers of products and related services, as well as business-to-government data sharing in exceptional circumstances. Amongst other norms, the rules allow for customers to effectively switch between different cloud and edge data-processing services providers, contributing to an overall framework for efficient data interoperability. The MCA is expected to be designated as the competent authority responsible for the overseeing and enforcing the provisions related to switching between data processing services.

Submarine cables are vital strategic infrastructure for communications and global financial transactions. The MCA actively participates in the European Submarine Cable Infrastructure Expert Group (SCIEWG), a specialised body dedicated to strengthening the security and resilience of submarine cable infrastructures. SCIEWG's mission is to offer expert guidance, foster information sharing among Member States and the EC, and coordinate efforts in alignment with the EC's Recommendation on Secure and Resilient Submarine Cable Infrastructures.

Sectoral Outlook

Electronic Communications

³ Directive (EU) 2022/2555 on measures for a high common level of cybersecurity across the Union.

⁴ Directive (EU) 2022/2557 on the resilience of critical entities.

⁵ Regulation (EU) 2023/2854 on harmonised rules on fair access to and use of data.

Electronic communications networks are critical infrastructure on which every nation's digital economy and information society depends. The MCA must ensure that business has the incentive to invest, innovate and grow, and help protect consumers from rising prices and lowering quality of goods and services. This means prioritising the MCA's work that improves the general conditions for the expansion and take-up of secure, competitive and reliable VHCNs - both fixed and wireless - while ensuring a smooth transition from legacy infrastructure, as well as upholding the interests of end-users.

Malta's electronic communications sector continues to demonstrate resilience, bolstered by sustained private investments in advanced fixed and wireless broadband networks. Operators remain focused on deploying VHCNs, reflecting a maturing market with significant potential for further innovation and competition. In the fixed broadband segment, there is a growing opportunity for competition to transition from reliance on regulated access to one driven by network replication and commercial agreements. However, Malta's small size, while creating efficiencies in infrastructure deployment, also presents economic complexities in network duplication and expansion.

The presence of two nationwide fixed broadband operators - GO and Melita - is a notable achievement that places Malta among the top performers in the EU. Nonetheless, the contribution of a third operator, even with limited coverage, remains important. Epic's presence, though reliant on regulated access, has brought more competition through innovative offerings and price dynamics, demonstrating the value of a diverse market structure. The mobile segment, where three operators, have driven competition and delivered consumer benefits such as investments in nationwide 5G coverage and steady price declines.

In line with the EECC, the MCA is guided by the principle of ensuring that regulation remains proportionate and does not persist longer than necessary. The EECC mandates that any regulatory withdrawal should be carefully managed to minimise market disruption, ensuring a seamless transition that continues to support competition and consumer benefits. By strategically balancing oversight with market-driven developments, the MCA will seek to ensure that Malta's fixed broadband market remains competitive and resilient, whilst continuing to invest and adapt to the challenges and opportunities of its unique context. This approach prioritises consumer interests, encourages efficient infrastructure use, and promotes sustainable competition.

In the second quarter of 2024, the MCA initiated a fresh market analysis of the wholesale fixed broadband access market in Malta, following the EC's veto of its previously proposed market regulation. As part of the market analysis the MCA will assess whether to continue enforcing access obligations between operators, as has been the practice so far, or whether the competitive landscape has evolved sufficiently to operate without regulatory intervention. In early 2025, the MCA plans to consult stakeholders on the findings of this new market analysis.

A targeted initiative in 2025 will focus on defining and measuring quality of service (QoS) parameters for providers of internet access and publicly available interpersonal communications services. This represents a key symmetrical measure, enabling the recording and comparison of operator QoS performance. By fostering transparency, it empowers users with reliable information to make informed choices and incentivises service providers to enhance their offerings. The MCA will also launch a mobile QoS benchmarking initiative to systematically evaluate and compare the quality of mobile network services provided by all operators in Malta. This benchmarking exercise will identify areas for improvement while promoting a fair and competitive market by holding operators to consistent performance standards. In parallel, the MCA will conduct an assessment of customer satisfaction with electronic communication services, gathering insights directly from user experiences. This feedback loop will ensure that consumer needs and expectations are addressed effectively, further driving market competitiveness and service quality.

The concurrent running of different mobile network technologies by each operator (2G, 3G, 4G, 5G), raises questions of efficiency, manageability, and environmental implications. The transitioning from legacy networks to more energy-efficient technologies is the next step to improve the environmental impact on Malta's electronic communications networks. A rationalisation exercise by phasing out one or more legacy mobile networks present complexities well beyond what might seem evident at first glance. In 2025, the MCA will continue to engage with the operators concerned on the eventual migration of services over legacy bands to IP-native 4G and 5G networks, paving the way for the eventual phase-out of legacy networks. While the responsibility for migration lies with the operators, extensive consultation and planning are required to ensure a smooth transition, protect competition, and safeguard end-users, particularly those who are most vulnerable.

Early in 2025 the MCA will update the licensing framework for the rights of use of the 2100 MHz and the 900/1800 MHz spectrum bands, which are set to expire in 2025 and 2026. As part of this process, the MCA plans to extend the existing licences for these bands to facilitate a streamlined multi-band assignment process in the future. This approach will also address unassigned spectrum bands and licences set to expire at later dates, such as the licences for the rights of use of the 800 MHz and 2.6 GHz which expire in 2033. By aligning spectrum licence expiration timelines, the MCA aims to enhance spectrum efficiency, foster alignment across bands, and ensure the sustainable, long-term management of wireless communication resources.

The MCA continues to invest in the upgrading of radio spectrum management processes and monitoring equipment. This ongoing investment enhances the MCA's capabilities to remotely identify and locate interference in licensed frequency spectrum and includes incremental additions to state-of-the-art infrastructure and tools for measuring electromagnetic fields (EMF).

As highlighted earlier, the MCA is expected to be designated as the competent authority for cybersecurity, with supervisory responsibilities under the NIS 2 Directive. This role will encompass oversight of essential and important entities, including providers of public electronic communications networks and services, trust services, and postal and courier services. Additionally, the MCA is anticipated to assume responsibility for ensuring the resilience of critical entities under the CER Directive. In 2025, the MCA plans to establish the necessary processes and reporting mechanisms to align with the frameworks set forth by the NIS 2 and CER Directives, reinforcing its commitment to safeguarding Malta's digital and critical infrastructure.

The MCA will continue to ensure consumers are treated fairly, are empowered to make choices that are right for them and are protected. The MCA will continue to ensure that the operators implement the required consumer protection measures relating to contracts and contract information. The MCA will also continue to focus its work on promoting effective compliance.

The proliferation of affordable technology has enabled a significant and growing volume of scam attempts conveyed by electronic communications services (such as phone calls and text messages), which disproportionately affect the most vulnerable individuals. In 2024, the MCA implemented measures aimed at mitigating number spoofing and vishing scams. The MCA put in place a framework of measures aimed at identifying, and subsequently blocking, potential scam calls received in Malta over international network interfaces. The blocking measures are focused on voice calls where the calling line identification (CLI) is from specific Maltese numbering ranges. The MCA will continue to work closely with the electronic communications sector, the government, and other regulatory bodies to make scams harder to perpetrate. Additionally, the MCA will also continue to empower consumers by raising awareness and providing clear information, enabling individuals to recognise and respond to fraudulent activities more effectively.

By fostering trust, promoting effective compliance, and addressing emerging challenges, the MCA aims to continue to safeguard a secure, competitive, and consumer-centric electronic communications environment that supports Malta's digital ambitions.

Digital Services

The MCA serves as Malta's designated Digital Services Coordinator (DSC) and lead competent authority for enforcing the DSA. This pivotal role entrusts the MCA with ensuring that intermediary service providers established in Malta comply with the DSA. The MCA actively collaborates with its European counterparts to promote a harmonized implementation of the DSA, ensuring consistency and cohesion in enforcement across the EU. This unified approach underpins the DSA's commitment to fostering a safer, more transparent, and accountable online environment for European citizens.

To achieve a coordinated and effective response to the DSA, the MCA has Memoranda of Understanding (MoUs) in place with key national stakeholders, including the Malta Police Force, the Information and Data Protection Commissioner (IDPC), the Commissioner for Children and the Malta Competition and Consumer Affairs Authority (MCCAA). These MoUs formalise collaborative processes for joint investigations and enforcement, reinforcing a multi-stakeholder framework to address the DSA's requirements.

At the EU level, the MCA plays a key role in overseeing the DSA as a member of the European Board for Digital Services (EBDS). The EBDS, composed of the Member States' DSC's and chaired by the EC, ensures the consistent application of the DSA and provides strategic guidance on emerging issues, particularly regarding Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs). The EC's priorities in enforcing the DSA include the protection of minors, tackling non-compliant eCommerce goods, addressing illegal content, and ensuring information integrity during elections. Through these collaborative efforts and targeted initiatives, the MCA, in partnership with the EC and other Member States, ensures the DSA's effective enforcement, advancing the goals of a secure, competitive, and fair digital ecosystem in Europe.

Beyond the DSA, the MCA continues to make significant strides in other digital service areas. The implementation of the Web Accessibility Directive (WAD) has resulted in notable improvements in the public sector's accessibility standards, with hundreds of websites and mobile apps assessed. Since 2020, more than 400 simplified website assessments, 70 in-depth website assessments and 25 in-depth mobile app assessments have been carried out and as a result the web accessibility posture of the public sector has improved considerably.

The European Accessibility Act is a far-reaching regulation that addresses all forms of accessibility to the benefit of disadvantaged segments of society. Among these is the accessibility of websites. The Government has assigned the website-related provisions of the European Accessibility Act to the Commission for the Rights of Persons with Disabilities (CRPD). The MCA will however be involved in an advisory role via a MoU with the CRPD.

The MCA is tasked with overseeing providers of trust services in Malta. The most secure trust services are designated 'qualified' trust services and are subject to special requirements under EUDI Regulation (previously eIDAS Regulation). The MCA maintains and publishes a qualified trust service provider list and services established in Malta. The EUDI Regulation also aims to ensure universal access for people and businesses to secure and trustworthy electronic identification and authentication by means of a personal digital wallet. The MCA has been designated as the competent authority responsible for supervisory duties for digital wallets established in Malta. Besides its role of supervisory body, the MCA participates in the task force set up to oversee the implementation of a European Digital Identity Wallet in Malta. The MCA will also contribute to implementing the EUDI Regulation into national law.

A series of MoUs are also in place with various local organisations and associations that have an interest in the digital environment. These agreements serve as a foundation for sound policy development and the promotion of general public awareness. Through these MoUs, the MCA is in a position to collaborate with various stakeholders and thus target their respective audiences in a more efficient manner. The MCA also has a number of MoUs with its European counterparts, recognising the need for collaboration and the exchange of best practices, in view that digital markets span beyond national boundaries.

With respect to eCommerce regulation, given the growth of Maltese online services and their usage, the MCA performs market monitoring, thereby increasing certainty and transparency to buyers. Market monitoring also enables the MCA to assist information society service providers to comply with respective rules, and where necessary, pursue enforcement procedures.

The MCA's strategic oversight and collaborative efforts are crucial in fostering a secure, competitive, and transparent digital ecosystem in Malta. By strengthening regulatory frameworks, enhancing public awareness and promoting stakeholder engagement, the MCA is ensuring the effective implementation of the various digital services regulations, supporting Malta's digital transformation while safeguarding consumer interests.

Postal Services

The trends identified in previous strategy updates remain consistent, with letter mail volumes continuing to decline. The decline in letter mail volumes is not limited to a local issue; in fact, it continues to be a global phenomenon, mainly driven by e-substitution. In contrast, the demand for parcel deliveries continues to see significant growth, fuelled by the rise in online shopping. The competitive landscape for parcel deliveries is also evolving, with non-traditional postal operators entering the market and expanding choices for consumers.

In 2024 the MCA published its decision on a review of the QoS performance targets for the universal postal service, aiming to uphold a high standard of service for users while supporting the financial sustainability of the universal service obligation (USO). Additionally, the MCA introduced an Automated Price Adjustment Mechanism - a pricing tool designed to bring transparency, fairness, and efficiency to services under the universal postal service that are subject to tariff regulation. This initiative reinforces the commitment to a pricing framework that adapts to the changing postal landscape.

Looking ahead, in 2025 the MCA will finalise a review the postal markets to assess whether the universal service provider (USP), MaltaPost, continues to maintain Significant Market Power (SMP) in any of the relevant markets falling within the scope of universal postal service. If the USP is found not to hold SMP, the MCA will consider withdrawing *ex-ante* price control regulation, removing the need for prior tariff approvals. The MCA will also continue to monitor

the financial sustainability of the universal postal service to ensure that it remains viable and responsive to market and consumer demands.

The MCA continues to adapt to the changing dynamics of the postal sector, focusing on maintaining service quality while promoting market efficiency. By introducing innovative tools like the Automated Price Adjustment Mechanism and monitoring market trends, the MCA is safeguarding the continued relevance and sustainability of the universal postal service in Malta.

Policy Shaping

Throughout 2024, the MCA continued to provide input to Government on a host of policy matters, notably EU-driven legislative initiatives as well as reviews of existing regulations and directives.

A series of specific tasks have been assigned to BEREC, amongst which, the drafting of opinions to the EC expected to be delivered by BEREC in 2025, such as the Opinion about the functioning of Roaming Regulation, the Opinion on the review of the universal service, the Opinion on Intra-EU communications Implementing Regulation and the Opinion on the review of European Commission's Recommendation on relevant markets susceptible to *ex-ante* regulation. As an active member of BEREC, the MCA has the obligation, and an interest to participate in the drafting and adoption of these opinions.

In 2025, the MCA will contribute to BEREC's evaluation of the EECC (including the evaluation of the universal service) in view of the EC's review scheduled for December 2025. BEREC must review the national implementation status throughout the EU and start considering to what extent the electronic communications framework is enabling the achievement of the EECC's objectives and whether the framework's provisions are effective to that end. The MCA will contribute, via BEREC, to the first assessment report on the functioning of the Roaming Regulation to be submitted to the European Parliament and to the Council by the end of June 2025. The MCA is participating in the processes undertaken by the EC, in relation to the review of wholesale voice call termination rates and of wholesale mobile roaming rates, that commenced in 2023. In line with the provisions of the GIA, the MCA is contributing to the development of BEREC guidelines on the coordination of civil works and access to in-building physical infrastructure. The MCA is also contributing, via BEREC, to the European Commission's Guidance on the sharing of physical infrastructure. In December 2025 the MCA will host the plenary meeting of the BEREC Board of Regulators and the BEREC Office Management Board.

As already mentioned, 2025 should see the review of the EECC and a proposal for a DNA. The MCA will be at the centre of things both insofar as the continued provision of policy advice to Government in the making of the EU legislation as well as in the eventual changes required to national legislation.

The ERGP is tasked with advising and assisting the EC in consolidating the internal market for postal services and ensuring the consistent application of the European postal regulatory framework. As a member of the ERGP, the MCA plays a crucial role in shaping regulatory best practices through its contributions to opinions, recommendations, and guidelines related to the implementation of the EU Postal Services Directive. The MCA actively participates in the ERGP Work Programme. Key focus areas include the potential review of the postal regulatory framework, the European Green Deal, digitalization, evolving consumer needs and the growth of e-commerce. In 2026, the MCA will host the ERGP plenary meeting in Malta. This event brings together heads and senior officials of NRAs and representatives of the EC to discuss and approve the work carried out by ERGP Expert Working Groups.

The MCA will continue to provide policy advice to the Government relative to Space-related topics, especially in relation to technical matters which fall within the MCA's remit. The MCA will continue to represent Malta in the High-Level Group on Internet Governance (HLIG) which is an expert group comprising experts from European member states with a view to ensure coordination at the European level and share expertise on internet governance related issues. The MCA will also continue to represent Malta on the ICANN Governmental Advisory Committee (GAC) which constitutes the voice of Governments and Intergovernmental Organizations (IGOs) in ICANN's multistakeholder structure.

In essence, most of the above-mentioned policy initiatives are known quantities and make for continuity from a strategic perspective. Having said this, the burden of following the relevant proceedings and translating the resultant policies into tangible outcomes, will be substantial. Above all, it necessitates an adequate number of knowledge workers who are both qualified and experienced in the required fields.

Research and Development

The MCA carries out an element of research to the extent that its human and financial resources allow. This research is necessary for staying up to date with relevant technological and policy developments. The MCA must be prepared to proactively respond to emerging trends in the event that they become mainstream.

Key areas of focus include, the emerging 6G technology, direct-to-device satellite technology, network virtualisation, cloud and edge computing, cybersecurity and the IoT. The MCA's involvement in multinational research and development initiatives enhances its exposure to cutting-edge innovations and business developments, particularly within the electronic communications sector. This engagement not only enriches the MCA's regulatory approach but also positions it as a forward-thinking authority capable of navigating the challenges and opportunities of an evolving digital ecosystem.

Although the MCA does not have a specific legal mandate to regulate carbon emissions in the sectors it regulates, it acknowledges the importance of sustainability within its current

responsibilities. The MCA will continue to consider factors relevant to sustainability and climate change in undertaking its work on future technologies, including understanding the role that such technologies can play in reducing the impacts of climate change. In addition, the MCA aims to collaborate with the Climate Action Authority on how it can contribute towards achieving climate neutrality by 2050.

Next Steps

This outlook serves to set the scene for the MCA's strategic direction during the plan period. In general, the prevailing trend largely aligns with the existing strategic direction established by the MCA for all regulated sectors.

3 Key Considerations

The underlying context to the Strategy Update for the period 2025 - 2027, provided in Section 2, effectively translates into a number of underlying key considerations:

- Sustainable and fair competition drives service quality, enhances consumer choice, promotes innovation and delivers significant benefits to consumers.
- Facilitating the deployment of very high-capacity fixed and mobile electronic communications networks remains a priority.
- Competitive incentives facilitate efficient commercial investment in new and existing infrastructure and services.
- The MCA will maintain competitive stimuli in the respective sectors via the right mix of regulation, information dissemination and facilitation.
- The nature and extent of commercial access agreements between operators is an indicator of competition in the respective markets and thereby influences the extent of regulation.
- Physical infrastructure access contributes to a competitive environment via efficiencies in network deployment, apart from producing positive environmental impacts and reductions in roads maintenance and urban disruption.
- Effective competition also depends on demand-side factors, such as the ability and willingness of customers to switch easily in response to a better deal in the marketplace.
- Increased dependence on the internet, by citizens and businesses alike, raises the stakes for the maintenance of the necessary levels of network and information security, resiliency and redundancy.
- Everyone everywhere should have access to affordable and high-speed connectivity.
- Broadband as a universal service presents opportunities in bridging the digital divide.
- Initiatives which encourage people to boosting their digital skills is important to ensure people and businesses in Malta can maximise their use of available gigabit internet and digital services.
- A thorough, ongoing and joined-up assessment of quality-of-service delivery serves to give better all-round awareness of service levels, leading to lasting improvements.

- Consumers have the right to be treated fairly, to make informed choices that align with their needs, and to be adequately protected.
- Consumers who are well informed about their rights and what they're buying are more confident and more likely to participate in the digital economy.
- Consumer protection will continue to be addressed through a mix of awareness-raising and regulatory intervention making use of new tools and powers for enforcement.
- Protecting consumers from unwanted or intrusive communications, phone-based scams and other trends that affect consumers will be addressed through a mix of awareness-raising and regulatory intervention.
- The monitoring of user quality of experience in the use of communications services is a valuable indicator of actual quality of service.
- Spectrum policy and management serves as a key tool in ensuring lasting efficiency, quality, safety and environmental awareness in electronic communications service delivery.
- Spectrum policy and management will be tailored to the needs of the national jurisdiction, within high level strategic and policy frameworks set at EU and international levels.
- The management of spectrum and numbers facilitates competition, enhances connectivity, and promotes efficient investment.
- The main challenge in a liberalised postal market will be ensuring the sustainability and currency of the universal postal service in the face of changing mail dynamics.
- The postal Universal Service Obligation (USO) should reflect users' present-day needs.
- The MCA will continue to develop the potential of electronic signatures and other trust services in order to facilitate any type of electronic transaction between citizens, companies and public administrations.
- The regulation of digital services will be addressed through a mix of regulatory oversight, enforcement, and stakeholder awareness.
- Initiatives to strengthen awareness of rights and obligations on both the supply and demand sides of ever-increasing local e-commerce activity, are one such instance of the need for stakeholder awareness raising.

- The MCA will supplement its monitoring role relative to online accessibility via awareness-raising initiatives, thus contributing to the inclusion of disadvantaged segments of society.
- The digital regulation function will continue to be strengthened in line with new regulatory responsibilities assumed by the MCA.
- The MCA will leverage its expertise in the sectors on which it has oversight, in providing related policy advice to Government.
- Active participation in EU and international fora will remain high, in view of the need to consistently put forward Malta's position, particularly in areas which are of particular relevance to the domestic environment.
- Participation in BEREC assumes a higher profile in view of its advisory role to the EC and as the guardian of internet openness, sustainability, and fair competition in digital ecosystems.
- Synergies with fellow institutional players will be continuously fostered and strengthened as necessary, also in light of new responsibilities assumed by the MCA under the Digital Services Act.
- Environmental considerations, in line with the principles set in the European Green Deal, are being incorporated into MCA's work programme.

The above considerations effectively serve to shape the MCA Strategic Objectives and work-programme.

4 Mission and Underlying Principles

The MCA's mission statement is stated hereunder:

'To promote and safeguard a communications environment that is conducive to investment, innovation, economic growth and social well-being'.

The Mission Statement reflects the MCA's commitment to bringing forward all forms of communications under its legal mandate, given also that all these constitute inter-related parts of the same ecosystem.

The MCA's Mission Statement embodies a set of principles, which the MCA holds central to all the activities that it carries out, namely the following:

- The MCA regards all communications sectors - digital and postal alike - within its legal mandate as equally essential to achieving its mission, recognizing these sectors as interdependent components of a unified ecosystem.
- In striving towards the fulfilment of its mission the MCA identifies a host of strategic objectives that it updates periodically in line with relevant developments.
- The relevant strategic objectives serve to provide the MCA with the necessary direction and focus on the fulfilment of its mission.
- The MCA ensures that communications markets operate in the interests of end-users and society.
- Through effective and relevant regulation, the MCA facilitates the development of a competitive communications sector in Malta that attracts investment, encourages innovation, and empowers consumers to choose and use communications services and applications with confidence.
- The MCA's activity serves to contribute to Malta's transition to a knowledge-based society and economy and to the maximisation of social and economic welfare.
- The MCA will serve as a focal point for policy shaping and implementation.
- The MCA's decisions will be transparent and duly motivated, such as to facilitate decisions by market players, policy makers and all other stakeholders.

In order to achieve its mission, the MCA needs to retain the necessary freedom to operate, whilst remaining accountable with respect to achieving Government's policy objectives. Thus, the MCA will:

- Continue to maintain the required level of independence enshrined in EU and national law.
- Consistently strive to co-ordinate its actions with Governmental and other stakeholders in the pursuit of its mandate.
- Measure and review its performance on an ongoing basis.
- Ensure that it is sufficiently resourced with the right level and mix of expertise and adequately financed to carry out its mission and mandate at optimal levels.
- Ensure that its organisational structures, human resources, financing, expertise and capabilities are updated in order to align with new responsibilities.

5 Strategic Objectives

The MCA's Strategic Objectives for the period covered by this Strategy Update are listed in this Section. As with the Mission Statement, these objectives are reviewed on an annual basis and fine-tuned or changed as necessary, in order to maintain full consistency and currency with the MCA's mission and mandate, in the context of the fast-changing environment in which it operates.

The MCA's Strategic Objectives are the following:

1. Promoting a competitive electronic communications sector that delivers efficient investment, innovation and choice.
2. Ensuring that electronic communications undertakings provide transparent, high-quality services to all users.
3. Maintaining open, safe and secure electronic communications
4. Maximising the potential of radio spectrum.
5. Supervising the provision of digital services.
6. Promoting a competitive postal sector that delivers efficient investment, innovation and choice.
7. Ensuring that postal undertakings provide transparent, high-quality services to all users.
8. Contributing to the development and implementation of sector policy.
9. Conducting relevant research, exploring and developing emergent policy areas.
10. Maximising operational excellence to ensure regulatory effectiveness and relevance.

The MCA's projects and ongoing tasks will all be targeted towards the achievement of any one of the above strategic objectives.

The MCA's activity has a clear multiplier effect on Malta's society and economy. The successful delivery of its programme is therefore key to Malta's success.

6 Individual Strategic Objectives - Outlook and Key Tasks

The MCA's major thrusts for the period under review, categorised by Strategic Objective, are outlined in this section:

Strategic Objective 1

Promoting a competitive electronic communications sector that delivers efficient investment, innovation and choice.

Outlook

- Facilitating the development, deployment and adoption of broadband services across multiple platforms
- Maintaining ideal conditions for a multi-player scenario in VHCNs

Key Tasks

- Safeguarding an effective and sustainable competitive environment
- Managing information as the means to promote competition
- Managing the compliance framework

New Thrusts

- Key thrusts are ongoing with emphasis on:
 - conclusion of the analysis of the market for the provision of wholesale fixed broadband access in Malta

Key Performance Indicators

The MCA will continue to monitor progress vis-à-vis this objective via the following key performance indicators:

Strategic Objective 1 – Key Performance Indicators

- Movements in number and variety of market players, as well as relative market shares
- Product and service price movements
- Turnover and profitability movements
- Availability of wholesale access reference offers
- New service offerings
- Overall electronic communications sector indicators
- Share of fixed broadband subscriptions equal or above 1 Gbps

Strategic Objective 2

Ensuring that electronic communications undertakings provide transparent, high-quality services to all users

Outlook

- Empowering users to confidently choose and use electronic communications services

Key Tasks

- Enhancing quality in the provision of publicly available electronic communications services via effective monitoring
- Enhancing the MCA's capabilities vis-à-vis consumer protection
- Ensuring universal access to electronic communications services for social and economic participation in society
- Improving consumer access to information

New Thrusts

- Key thrusts are ongoing, with emphasis on:
 - finalisation of QoS rules and relevant monitoring framework
 - publishing findings from the mobile QoS benchmarking exercise
 - assessing the quality level of satisfaction amongst users
 - protecting consumers from phone-based scams

Key Performance Indicators

The MCA will continue to monitor progress vis-à-vis this objective via the following key performance indicators:

Strategic Objective 2 – Key Performance Indicators

- Publicly available information relative to required QoS measures
- Stakeholders' perceptions of the overall value and quality of services provided
- Stakeholders' perceptions of the regulator
- % of complaints placed with MCA dealt with satisfactorily

Strategic Objective 3

Maintaining open, safe and secure electronic communications.

Outlook

- Enhancing the security, integrity and reliability of public electronic communications networks and services
- End-users have widespread access to high-quality and secure communications networks, services and applications

Key Tasks

- Monitoring the security, safety, integrity, resilience, and availability of publicly available fixed and mobile electronic communications networks and services
- Ongoing oversight of net neutrality practices to ensure compliance
- Participation in EU and global Internet Governance Fora
- Ensuring continued monitoring and respect of EMF thresholds
- Mapping of broadband services as an information tool relative to broadband network capabilities

New Thrusts

- Key thrusts are ongoing, with emphasis on:
 - publication of a regulatory framework focused on the cybersecurity of public electronic communications networks, publicly available electronic communications services
 - continued EMF oversight

Key Performance Indicators

The MCA will continue to monitor progress vis-à-vis this objective via the following key performance indicators:

Strategic Objective 3 – Key Performance Indicators

- Extent of public confidence in the Internet
- Number and nature of security incident reports
- Reports regarding Net Neutrality practices
- Cybersecurity monitoring processes in place
- Number of ongoing inspections/site visits (interference, radiation, etc.)

Strategic Objective 4

Maximising the potential of radio spectrum.

Outlook

- Ensuring spectrum resources are available to support innovation
- Continue updating spectrum monitoring mechanisms

Key Tasks

- Facilitating the availability of spectrum resources to support innovation
- Rationalisation of mobile spectrum usage for efficiency and environmental sustainability purposes
- Ensuring efficient and effective use of spectrum and associated radiocommunications equipment
- Management of scarce resources used by space systems and for the provision of satellite communications services

New Thrusts

- Key thrusts are ongoing, with emphasis on:
 - engaging with operators for the eventual phasing out of legacy technologies
 - engaging with electronic communications operators on mobile technology migration towards Voice-Over-LTE (VoLTE)
 - engaging with operators on migration towards 5G Standalone (5G SA) networks and Voice over New Radio (VoNR)
 - framework for the reassignment of spectrum bands for wireless communications services which licences for the rights of use expire in 2025 and 2026

Key Performance Indicators

The MCA will continue to monitor progress vis-à-vis this objective via the following key performance indicators:

Strategic Objective 4 – Key Performance Indicators

- Progress towards 5G SA deployments
- Improved mobile broadband speeds and penetration
- Extent of spectrum availability to market
- Migration towards VoLTE and the phasing out of 2G/3G legacy networks

Strategic Objective 5

Supervising the provision of digital services.

Outlook

- Continue strengthening regulatory capacity vis-à-vis digital services
- Increasing public awareness, confidence and accessibility

Key Tasks

- Ensuring compliance with the eCommerce Act, the DSA and the EUDI Regulation
- Organising stakeholder fora, commissioning of surveys of usage and perceptions of digital services
- Targeted information campaigns on various digital services
- Maintaining regulatory oversight on relevant activities
- Monitoring public sector websites and mobile applications accessibility

New Thrusts

- Develop the organisational capacity to supervise providers of European Digital Identity Wallets established in Malta

Key Performance Indicators

The MCA will continue to monitor progress vis-à-vis this objective via the following key performance indicators:

Strategic Objective 5 – Key Performance Indicators

- Service provider awareness of their legal obligations
- Public awareness of their rights with respect to e-commerce
- Progress in website accessibility
- Progress in utilisation of trust services

Strategic Objective 6

Promoting a competitive postal sector that delivers efficient investment, innovation and choice

Outlook

- Management of the competition regulatory framework

Key Tasks

- Enhancements to the USPs economic control model / Automated Price Mechanism
- Analysing competition dynamics in specific postal markets
- Managing the postal compliance framework
- Monitoring performance via collection and analysis of data

New Thrusts

- Review of the postal markets to assess whether the USP continues to hold SMP in any of the relevant markets falling within the universal postal service area

Key Performance Indicators

The MCA will continue to monitor progress vis-à-vis this objective via the following key performance indicators:

Strategic Objective 6 – Key Performance Indicators

- Number of postal services providers in the various postal markets
- Postal volumes, prices and other relevant trends
- New and innovative service offerings
- USP making reasonable return on capital

Strategic Objective 7

Ensuring that postal undertakings provide transparent, high-quality services to all users

Outlook

- Supporting continued sustainability, efficiency, and quality of the universal postal service
- Postal service users can choose and use postal services with confidence
- Postal service providers implement effective complaints and redress procedures

Key Tasks

- Determining the ongoing feasibility of the existing postal service obligations
- Managing the compliance framework, with focus on quality service provision
- Improving consumer access information
- Ongoing management of the EU regulation on cross-border parcel delivery

New Thrusts

- Key thrusts are ongoing with emphasis on securing a universal postal service, having regard to financial sustainability and efficiency

Key Performance Indicators

The MCA will continue to monitor progress vis-à-vis this objective via the following performance indicators:

Strategic Objective 7 – Key Performance Indicators

- QoS performance in relation to set targets
- USP and MCA complaints statistics
- Postal volumes, prices and other relevant trends
- Public and business perceptions (biennial)

Strategic Objective 8

Contributing to the development and implementation of sector policy.

Outlook

- Providing policy input to Government, notably on major EU proposals, as well as on national matters.
- Contributing to the work of relevant EU and international bodies

Key Tasks

- Provision of input to EU-driven policy proposals
- Interaction with EU and related bodies
- Active involvement in regulatory and policy bodies where the MCA is a member
- Interaction with major non-EU bodies notably International Telecommunication Union (ITU), European Conference of Postal and Telecommunications Administrations (CEPT) and UPU
- Provision of ongoing policy advice to Government

New Thrusts

- Key thrusts are ongoing, with emphasis on:
 - Supporting Government in the EU-level discussions on the forthcoming policy proposals, notably the Digital Networks Act and the Postal Services Directive
 - Active participation in BEREC and ERGP
 - Hosting the BEREC plenary meeting in December 2025
 - Active participation in the EBDS established under the DSA

Key Performance Indicators

The MCA will continue to monitor progress vis-à-vis this objective via the following performance indicators:

Strategic Objective 8 – Key Performance Indicators

- The MCA will, on an ongoing basis evaluate:
 - the effectiveness of its participation in EU and international fora
 - the quality of its advice to Government on relevant policy matters
 - trust placed in it through tasks assigned to MCA staff within EU and international bodies

Strategic Objective 9

Conducting relevant research, exploring and developing emergent policy areas.

Outlook

- Exploring emergent policy areas of relevance to the Authority's mandate

Key Tasks

- Supporting fixed and wireless broadband research and development
- Continue addressing the implications of the European Green Deal on relevant sectors and the MCA's regulatory mandate

New Thrusts

- Key thrusts are ongoing with emphasis on:
 - encouraging the communications sector to increasingly consider its environmental sustainability
 - promoting the role that the communications sector can play for connectivity to be an enabling factor in facilitating the carbon footprint of other sectors

Key Performance Indicators

The MCA will continue to monitor progress vis-à-vis this objective via the following key performance indicators:

Strategic Objective 9 – Key Performance Indicators

- New and innovative services, or improvements on existing services deployed, trialled in or offered from Malta
- Assessment of Malta's performance in this area vis-à-vis any comparable benchmarks

Strategic Objective 10

Maximising operational excellence to ensure regulatory effectiveness and relevance.

The MCA operates within a dynamic and complex landscape, characterised by constant changes, in the sectors it regulates and the overarching policy context. To effectively navigate this landscape, the MCA is committed to being an active and agile organisation, capable of responding to the rapidly changing environment and effectively addressing challenges that affect the MCA's ability to fulfil its mission in a timely manner.

The MCA aims to be a model for excellence by effectively managing its resources, maintaining a commitment to transparent and responsive processes that encourage public involvement and decision-making that best serves the public interest, and encouraging a culture of collaboration both internally and across government entities.

The MCA's ability to deliver on its mission hinges on four key drivers of organisational success: maintaining an informed regulator with a deep understanding of the sectors; fostering proactive stakeholder engagement; adapting to our evolving mandate; and optimising our people and processes. In addition, regulation is only effective when regulated entities comply with their regulatory obligations.

Compliance and enforcement

In terms of compliance and enforcement, the MCA's statutory functions can be divided into two categories: to ensure that regulated entities comply with their regulatory obligations and to ensure that the radio spectrum is managed in an efficient and effective manner.

The MCA's enforcement strategy focuses on a culture of compliance, active monitoring of regulatory obligations, targeted enforcement and effective deterrence. This includes supporting stakeholders to understand how to comply with their regulatory obligations.

Performance planning and review

The MCA is committed to maintaining efficient and effective strategic and business planning, along with the monitoring of actual performance against predetermined targets. Performance planning cascades from the strategic and business planning tier to individual staff performance planning programmes. All these components are co-ordinated and regularly reviewed and updated in a process of continuous improvement.

The MCA consistently ascertains the validity of its performance by reviewing its activities on an ongoing basis, assessing whether outputs and outcomes are being attained and reviewing its plans accordingly.

Human resources

The MCA is committed to fostering a knowledge-based, well-structured workforce capable of effectively fulfilling its mission and mandate. For the MCA to be an informed regulator, in addition to access to high-quality and reliable data in a timely manner, it must have skilled staff who can undertake analysis to produce high-quality research and insights.

Performance-based activity permeates down to the individual level by means of individual performance assessments, which tie into the achievement of organisational goals. Staff performance measurement is a reflection of the organisation's progress in meeting its strategic objectives.

Staff motivation is considered a key element for the success of the MCA's mission. The MCA is committed to maintaining an environment that brings out the best in the people it employs.

The MCA places high value on the ongoing training of staff in both soft and hard skills and is committed to periodically carry out a structured programme across the entire organisation as the basis for its training schedule. Such structured training is over and above the essential 'on the job' knowledge gathering that takes place on an ongoing basis. The latter includes overseas specialised technical and professional training as well as study visits to and exchanges with fellow NRAs in other EU member states. The MCA ensures that all member of the MCA's workforce and candidates for employment have equal access to opportunities for employment, career growth, training.

Ongoing participation in BEREC and ERGP workgroups has also served its purpose as a highly valued means of investing in expertise. The MCA staff members eventually provide a return by contributing as co-drafters on a number of these workgroups. Various MCA representatives are also being nominated and considered as Co-Chairs of these expert workgroups.

The MCA must position itself competitively to attract and retain top talent, enabling it to fulfil its mandate effectively and remain at the forefront of regulatory excellence.

In 2025, the MCA is poised to take on new responsibilities, presenting a strategic opportunity to expand its regulatory role within the digital ecosystem. This evolution supports the MCA's mission to foster a dynamic communications environment that drives investment, innovation, economic growth, and societal well-being. To meet these challenges, the MCA will ensure that its organisational structures, human resources, funding, expertise, and capabilities are fully aligned with its expanded responsibilities.

The MCA remains committed to nurturing and retaining its current talent pool while strategically recruiting additional expertise to support its mission. As its remit evolves, the MCA will maintain a flexible approach, balancing in-house capacity with outsourcing to ensure efficiency and effectiveness in addressing its expanded mandate.

Outsourcing of expertise

In those instances where it is feasible to do so, the MCA will outsource requirements for services whenever these involve the need for specific expertise that is not available within the Authority. The MCA will also consider outsourcing where the need for such services is short-term, and mainly serves to address a pressing need. The MCA is committed to dedicating the necessary resources towards the management of contractors, with a view to obtaining the best possible value in services received both in terms of contracted outputs as well as via knowledge transfer.

Organisation

An organisation that operates in a highly dynamic environment needs to have the in-built flexibility to adapt to changing circumstances. The MCA retains such flexibility via a matrix mode of operation that cuts across formal organisational boundaries and brings together staff from various units and disciplines together to work on specific assignments.

As new functions are assumed the MCA will dovetail these with its business in as seamless a manner as possible. The MCA mission, strategic and business objectives, organisation structure, policies and procedures will be updated to reflect the new state of affairs.

Resources

For the MCA to function at desired levels and empower its staff members to achieve optimal performance, it needs to ensure that they are adequately equipped to carry out the task. In this respect the MCA is committed to providing the environment that is most conducive to productivity. This commitment is reflected in the provision of adequate premises and ICT resources as well as other logistical support necessary for the successful execution of tasks. The MCA is committed to maintaining a high level of cybersecurity readiness and presence by providing its staff with a secure digital infrastructure.

The MCA also deems information management as being a fundamental resource to this organisation and will see to setting up new information systems and processes as necessary, as well as maximising the potential of existing ones. The MCA considers keeping staff updated on developments on an ongoing basis as a fundamental component of its information management activity.

Financial autonomy represents another important pillar in the maintenance of the MCA's status as an independent and effective regulator as well as to achieve desired targets in the case of other mandated non-regulatory activities. The MCA follows principles of good governance, ensuring that it has adequate finances to meet its mandate and that it delivers the best possible service to stakeholders. In so doing this organisation ensures that it is fully accountable for its activities and related incomes and expenditures.

The MCA ensures that financial reporting reflects the various activities carried out and the related sources of funding. The MCA dedicates the necessary resources towards maintaining its accountability framework to the highest standards. The MCA ensures that all financial operations are helping control or contain costs, providing high quality customer service, and improving the effectiveness and efficiency of the MCA's operations by conducting a programme of continuous review and evaluation.

Financial autonomy by itself is not effective in achieving targeted objectives without equal autonomy in personnel recruitment and speed of procurement. Thus, in order to be able to deliver its programme the MCA requires the collaboration and timely input of other institutional players, not only in the area of finance but also in the case of recruitment and procurement. Such collaboration and input are to be seen in the context of the MCA's independence and accountability, as enshrined in law.

The MCA also considers timely collaboration from other institutional players as a critical input towards successful outcomes, particularly in instances where projects span a number of government bodies. In the same spirit the MCA is committed to providing timely and quality input to institutional players whenever such is reasonably required.

In 2025 the MCA will implement a new Enterprise Resource Planning (ERP) system. The new ERP will integrate with the digitisation of the radiocommunication licensing function, establishing a synergistic connection between the cutting-edge ERP system and the streamlined licensing processes. The digitisation of the radiocommunications equipment licences will provide better online process for stakeholders and enable the MCA to provide a more efficient licensing service.

7 Key Priorities

Progress on 2024 Key Priorities

Insofar as the key strategic priorities that the MCA identified in its 2024 Strategy Update, it is good to note substantial progress on all fronts as indicated below:

MCA Priority: *Publish Decision on the analysis of the market for the provision of wholesale physical and virtual infrastructure access (PVIA) and identification of relevant remedies.*

MCA Priority: *After reaching a final Decision on the analysis of the market for the provision of wholesale physical and virtual infrastructure access, in line with the procedures delineated in the EECC for the consistent application or remedies, carry out a review of current wholesale remedy for virtual unbundled local access.*

Progress: The MCA's draft measure regarding the regulation of the PVIA market was notified to the EC on the 28th December 2023. The EC expressed serious doubts, prompting a second phase assessment. BEREC issued an opinion rejecting the EC's serious doubts. However, after further correspondence, the EC decided on 27th March 2024, that the MCA's draft measure should be withdrawn and a new market analysis conducted.

The EC noted that “*The market scenario in Malta is unique, with two nationwide networks, GO, the incumbent, and Melita, providing extensive coverage through fibre and coaxial cable networks. A third network, owned by Epic, also contributes to the competitive landscape albeit with partial coverage. The MCA's draft measure targeted GO, identifying it as having significant market power (SMP) and therefore proposed to regulate it. However, the EC's analysis suggests that the competitive pressure from Melita's coaxial cable network, which has a higher retail market share, must be assessed properly before any market power determination is made.*” In addition, the EC noted that “*The MCA must revisit its findings in light of the Commission's objections and re-notify the market review. In the meantime, the current regulation will remain in place*”. Disagreeing with BEREC's view that three networks ensure effective competition, the EC argued that such a high threshold for deregulation, in particular in the national circumstances of Malta, could lead to the continuing regulation instead of progressively reducing *ex ante* sector-specific rules, if justified by the level of effective competition in the market.

On May 9, 2024, the MCA notified the EC that it is withdrawing its draft measure. The MCA commenced a new market analysis, taking into account the views of the EC and BEREC. Following a public consultation early in 2025, the MCA will need to notify the EC and BEREC with a new draft measure.

MCA Priority: *Publish Decision for relevant quality of service (QoS) rules for electronic communications operators and set up monitoring framework.*

Progress: In 2024 the MCA published a tender for interested parties to express their interest in submitting offers for a mobile QoS benchmarking exercise. This will be followed by the commencement of the QoS benchmarking exercise. This exercise will enable consumers to be in a position to verify the claims made by mobile operators regarding the quality of their broadband services. This initiative aims to promote a more competitive environment in the mobile market. The results of the first QoS benchmarking exercise are expected to be published in 2025.

A decision on the QoS measurement parameters is expected to be published in 2025, following a new public consultation process. Through this initiative, providers of internet access and publicly available interpersonal communications services will be required to publish comparable, reliable, user-friendly, and up-to-date information on service quality. This will empower individuals and businesses to make informed decisions when choosing electronic communications services, while also encouraging operators to enhance service quality and customer experience. The publication of QoS information will help foster a more competitive environment across the electronic communications markets.

MCA Priority: *Publish Decision on preventive measures to mitigate calling line identification (CLI) spoofing and vishing scams.*

MCA Priority: *Raise consumer awareness on how users of electronic communication services can protect themselves from scams.*

Progress: In April 2024, the MCA published its decision on preventive measures to combat Caller Line Identification (CLI) spoofing and vishing scams. This decision put forward a framework of measures aimed at identifying, and subsequently blocking, potential scam calls received in Malta over international network interfaces. The blocking measures are focused on voice calls where the CLI is from specific Maltese numbering ranges. The framework also includes transparency measures aimed at raising awareness on the potential impact of the blocking measures, as well as measures to regulate the conditional provision of decoupled call origination services, which may continue to be availed by users for legitimate purposes, subject to new validation measures meant to eliminate spoofed calls with malicious intent. Local operators of international network interfaces were obliged to implement blocking measures by October 2024. From that point onward, all incoming calls with a Maltese CLI from specific numbering ranges, received through such interfaces, will be filtered to detect and block both potential scam calls and calls originating from unauthorised service providers. The MCA actively engaged with stakeholders, including operators and major users of cloud-based decoupled call services, to ensure the smooth implementation of the decision. Consumer awareness on how users of electronic communication services can protect themselves from scams is also ongoing.

MCA Priority: *Publish a final decision on Operator measures to safeguard network integrity and security and chart implementation process.*

Progress: A final decision on operator measures to safeguard network integrity and security has been postponed due to the ongoing transposition of the European NIS 2 Directive. It is expected that the MCA will retain its current mandate for providers of publicly available electronic communications networks and services, as well as trust service providers. Additionally, the MCA may see its remit expanded to encompass other digital infrastructures and postal services. The exact nature of MCA's role has not, as of December 2024, been finalised. The MCA expects, however, that greater clarity will be forthcoming early in 2025.

MCA Priority: *Population of the broadband mapping solution with relevant data as an information tool for consumers, industry and the MCA.*

Progress: The obligation emerging from the EECR regarding a geographical survey on the reach of electronic communications networks capable of delivering broadband services was completed with a report on the broadband situation in Malta. The report captured the service providers' technologies being offered, together with their coverage. The MCA's mapping platform enables it to geographically map information on fixed and broadband networks and related services across Malta and Gozo. It is the intention of the MCA to enhance the use of the mapping platform to enable consumers to be in a position to check coverage and availability of fixed and wireless broadband infrastructures, information on the operators, service and technology availability, available bandwidths and quality of public electronic communications networks and services. Throughout 2024 the MCA continued to populate the mapping platform with relevant data.

MCA Priority: *Continue EMF oversight and overseeing the implementation of the EMF guidelines.*

Progress: The effective monitoring of electromagnetic fields (EMF) emissions with a view to ensuring that levels of electromagnetic radiation do not exceed the levels established by the ICNIRP continued throughout 2024. The MCA also published its quarterly audit reports on the findings and analysis related to EMF audits in Malta and Gozo.

MCA Priority: *Publish a framework for the assignment of available wireless broadband radio spectrum bands including those bands which expire in 2025 and 2026.*

MCA Priority: *Continue engaging with electronic communications operators on mobile technology migration towards Voice-Over-LTE (VOLTE) and 5G Standalone (5G SA).*

Progress: The MCA initiated stakeholder engagement to explore the potential extension of spectrum licenses for wireless broadband services set to expire in 2025 and 2026. The goal is to develop a unified licensing framework that aligns the expiration dates of these licences with those of other spectrum licenses, such as those for the 800 MHz and 2.6 GHz bands, which are valid until 2033. Meanwhile, spectrum in the 700 MHz and 26 GHz bands remains unassigned. Additionally, the MCA is engaging with operators on migrating mobile technology to VoLTE and 5G SA and transitioning services from 2G / 3G networks. Of note is that one local mobile operator has already launched VoLTE services. While the migration is the operators' responsibility, extensive consultation and planning are required to ensure a smooth transition, protect competition, and safeguard end-users, including vulnerable ones.

MCA Priority: *Continue to set up the organisational capacity and processes for the DSA, including coordination with other public authorities that have a role in the effective implementation of the DSA.*

Progress: The DSA has been successfully implemented into Maltese law by virtue of the Digital Services (Designation and Enforcement) Order, which came into force on 12th March 2024. The Order formally designated the MCA as the Digital Services Coordinator (DSC). As the DSC, the MCA is responsible to ensure that online intermediaries and online platforms established in Malta play by the rules stipulated in the DSA. The MCA has set up the necessary internal structures, processes and procedures for the implementation of the DSA. The MCA is actively participating in, and contributing to, the main DSA activities of the EC and the European Board for Digital Services (EBDS). Additionally, it has been proactive through various educational initiatives targeting both service providers and relevant authorities.

MCA Priority: *Continue to raise awareness on digital services such as accessibility of Public Sector websites and mobile applications, and trust services to enhance uptake and usage.*

Progress: Various initiatives on raising awareness on digital services including accessibility of public sector websites and mobile applications continued in 2024 with the objective to enhance usage and awareness.

MCA Priority: *Continue to identify required structural changes to the USO in order to adapt to changes in the postal market and user needs together with relevant stakeholders.*

MCA Priority: *Review of the postal markets to assess whether the USP continues to hold SMP in any of the relevant markets falling within the universal postal service area.*

Progress: The sustainability of a universal postal service is a challenge, driven by digitalization, reducing traditional letter mail volumes, and increased competition in e-commerce deliveries. A decision on the revision of MaltaPost's QoS performance targets for the universal postal service was published in January 2024. The revised QoS standards aim to ensure a satisfactory level of service for users while promoting the financial sustainability of the universal postal service. A postal tariff mechanism came into effect from September 2024. The postal tariff mechanism has the objective of supporting continued service provision of universal postal services in an efficient manner. The mechanism establishes price caps in line with the principle of cost orientation. A review of the postal markets within the scope of the universal postal service to assess whether MaltaPost continues to hold SMP in any of the relevant markets will follow the implementation of the postal tariff mechanism.

MCA Priority: *Participate in the EU debate relative to the review of the Gigabit Infrastructure Act (GIA) and the envisaged Digital Networks Act (DNA).*

Progress: The GIA entered into force in May 2024. The GIA, designed to reduce the cost of deploying gigabit electronic communications networks, replaces the Broadband Cost Reduction Directive (BCRD). BCRD provisions remain still in force, until the respective GIA provisions enter into force, i.e., until 12 November 2025. The MCA provided input to Government during the discussions on the draft legislative proposal, together with Transport Malta (TM) and other stakeholders. The Ministry responsible for Infrastructure will lead the GIA's implementation. The MCA has a key interest in facilitating access to physical infrastructure for electronic communications services. The MCA is contributing to the development of BEREC guidance, on fair and reasonable terms for access to in-building physical infrastructure and coordination of civil works. The MCA is also contributing to the Commission's guidance on the application of Article 3 (sharing of existing physical infrastructure) of the GIA. The MCA will collaborate closely with the Ministry for Transport, Infrastructure and Public Works (MTIP) and other relevant Ministries to ensure the effective implementation of the GIA.

In February 2024, the EC published a White Paper on the future of EU connectivity, potentially leading to a proposal for a Digital Networks Act (DNA). Concurrently, the EC issued a recommendation to enhance the security and resilience of submarine cable infrastructures at both EU and national levels. The Authority, as a member of BEREC, contributed to the EC's public consultation on the White Paper, highlighting technological trends and market developments. BEREC emphasized that competition remains the key driver for investment and innovation. BEREC's contribution focused on universal services, affordability, sustainability, security, and resilience. BEREC stressed that the White Paper's scenarios and proposals must align with the existing electronic communications legislative framework, including Open Internet and end-user protection.

2025 will see extensive discussion on the future of telecoms regulation leading to a proposal for a new telecoms regulatory framework to incentivise integrated connectivity and computing infrastructures, creating equitable conditions for all service providers - initiative will build on feedback from the Commission's White Paper "How to master Europe's digital infrastructure needs?" and insights from the Letta report on the Future of the Single Market and the Draghi report on the state of the EU economy's competitiveness. The MCA will play an active role in, upon request, advising the Government, and, through BEREC, the EC.

MCA Priority: *Participate in BEREC and ERGP and in the delivery of the respective work programmes including in the drafting of Opinions to the EU Commission.*

Progress: Active engagement and contribution to BEREC and ERGP working groups is essential, as it provides the opportunity to develop and share knowledge on the regulation of the communications sector (including electronic communications, radio spectrum management, postal services, and the broader digital ecosystem). Dedicated teams within the MCA contribute to the development of various Opinions, Report and Guidelines. Through its participation in such fora the MCA is well positioned provide informed advice to Government, ensuring that emerging areas of communications and digital regulation yield positive outcomes for Malta.

List of 2025 Key Priorities

The MCA, as part of its strategic planning exercise, has identified the following priority tasks for 2025 that are considered as the top priority areas for the MCA to achieve its objectives:

- Consult and publish a decision on the regulatory approach for the wholesale fixed broadband access market in Malta.
- Consult and publish a decision on QoS rules for electronic communications operators, covering internet access services and publicly available interpersonal communications services.
- Consult and publish a decision on a regulatory framework focused on the cybersecurity of public electronic communications networks, publicly available electronic communications services and trust services.
- Publish the findings from the benchmarking exercise on the quality of service across the mobile technology platforms.
- Publish a decision on the re-assignment of the radio spectrum bands used for wireless communications services expiring in 2025 and 2026.
- Continue to engage with operators on migration towards Voice-Over-LTE (VoLTE), paving the way for the phasing out of legacy 2G and 3G networks.
- Engage with operators on migration towards 5G Standalone (5G SA) networks and Voice over New Radio (VoNR).
- Continue EMF oversight and monitoring of the implementation of EMF guidelines.
- Monitor and enhance preventive measures to mitigate calling line identification spoofing and vishing scams.
- Continue efforts to educate consumers on protecting themselves against electronic communications service scams.
- Maintain ongoing supervision, enforcement and monitoring to ensure compliance with the Digital Services Act (DSA).
- Develop the organisational capacity to supervise providers of European Digital Identity Wallets established in Malta.
- Promote awareness on digital services including public sector websites and mobile applications accessibility, and trust services.

- Continue supporting and developing access to affordable universal electronic communications services by vulnerable users, together with other Government entities.
- Continue active engagement with MaltaPost's to monitor and support the long-term sustainability of delivering a Postal Universal Service.
- Review of the postal markets to assess whether the Universal Service Provider (USP) continues to hold Significant Market Power (SMP) in any of the relevant markets falling within the universal postal service area.
- Participate in the EU-level discussions on the reform of electronic communications and postal regulatory frameworks, and provide relevant expert advice to Government on such matters, as necessary.
- Participate in BEREC and ERGP work programmes including in the drafting of Opinions to the European Commission and the EU institutions.
- Host the plenary meeting of the BEREC Board of Regulators, BEREC Management Board and the IRG General Assembly in Malta in December 2025.
- Migrating to a new enterprise resource planning (ERP) system and use of business intelligence tools to enhance operational efficiency.

The above tasks are also listed under the individual Strategic Objectives that they address.



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